

PRIVACY POLICY
pursuant to Article 13 of EU Regulation 2016/679

Please find below a description of the essential characteristics of processing to be carried out on your personal data.

E-VAI S.r.l., with registered address in Piazzale Luigi Cadorna 14 – 20123 Milan, email compliance@fnmgroup.it, acting as Data Controller (hereinafter, the “Data Controller” or the “Company”) wishes to inform you that your personal data shall only be processed for purposes of sending a newsletter. Upon simple request, using the contact information appearing below (see Paragraph 1), you may exercise those fundamental rights granted to you by the Regulation as against the Data Controller. These include the right of access, confirmation, and disclosure of your data. For further information, please review the detailed Policy that follows.

Pursuant to Article 13 of EU Regulation 679/2016 (27 April 2016), the General Data Protection Regulation (hereinafter, “Regulation”), we would like to provide you the following information on the processing of your personal data.

1. IDENTITY AND CONTACT INFORMATION FOR THE DATA CONTROLLER AND FOR THE DATA PROTECTION OFFICER

1.1 The Data Controller is E-VAI S.r.l., with registered address at Piazzale Luigi Cadorna 14 – 20123 Milan, email compliance@fnmgroup.it. The Data Protection Officer may be contacted using the contact information appearing below: postal address, P.le Cadorna 14/16, 20123 Milan; dedicated email inbox: dpo@e-vai.com. Any updates to these contact details will be published on www.e-vai.com. All requests regarding personal data processed by the Company may be sent to the registered address or to the following email address: compliance@fnmgroup.it.

2. PURPOSES OF DATA PROCESSING. LEGAL BASIS FOR PROCESSING

We will process your data for the purposes set forth below, along with the legal basis for processing.

2.1 Personal Data

The Data Subject has expressed consent to the processing of his/her personal data for one or more specific purposes (Article 6, paragraph 1, subpart [a], EU Regulation 2016/679)

We will process your personal information solely to respond to your request to have a newsletter, published by the Data Controller, sent to you; the newsletter shall only be sent to the email address you provided.

Therefore, the sending of the newsletter is predicated on your consent, which you may express by ticking the appropriate box on the home page of Data Controller’s website.

3. DATA RECIPIENTS OR CATEGORIES OF DATA RECIPIENTS, IF ANY

3.1 Personal Data. Special categories of data.

In order to achieve the objectives set out in Point 2.1, your personal data may be disclosed to the following recipients, or categories of recipients:

- third parties, that is, persons authorised to carry out processing under the aegis of the Data Controller;

E-VAI S.r.l., a single-shareholder company

Piazzale Cadorna, 14
20123 Milan, Italy

Ph. +39 02 8511 1 - Fax +39 02 8511 4708
PEC [certified email] evai@legalmail.it

Share Capital €1,100,000.00, fully paid
Enrolled in the Business Register of the C.C.I.A.A.
[Chamber of Commerce, Industry, Agriculture, and Trade]
of Milan/Monza Brianza/Lodi
Tax ID and VAT no. 09541470960 - REA [Econ./Admin.
Index] MI 2097190
Company subject to the direction and coordination
of FNM S.p.A.



- the following Data Processors: FNM S.p.A., as a provider of administrative and IT services; as well as to distinct and/or additional parties providing IT maintenance and/or support with respect to Company's IT systems, services, and databases;
- entities, companies, public agencies and/or bodies to whom data disclosure is necessary or mandate by law.

4. **TRANSFER OF DATA TO THIRD COUNTRIES OR TO AN INTERNATIONAL ORGANISATION**

Your data will not be transferred to other countries or international organisations.

2. **PERSONAL DATA STORAGE PERIOD**

2.1 Personal Data Special categories of data.

Pursuant to the principles of lawfulness, data minimisation, and the purposes stated *supra*, your data will be stored until you revoke consent to their processing, as described under article 6, *infra*.

Data may be stored beyond such period to comply with specific statutory or regulatory duties, and insofar as needed to ascertain, exercise, or defend a right in a court of law.

3. **UNSUBSCRIBING**

To unsubscribe from the newsletter, you may send an email to: customerservice@e-vai.com, following the instructions provided in the newsletter email. You may send a request for technical support to the same email address.

5. **RIGHTS OF DATA SUBJECTS**

5.1 **Right of access, rectification, erasure and restriction of processing**

The Data Subject has the right to request:

- access to data (the Data Subject shall have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her is being processed, and, where that is the case, access to the personal data and the following information, as well as where personal data is transferred to a third Country or to an international organisation, the Data Subject shall have the right to be informed of the appropriate safeguards in accordance with relevant regulation);
- rectification of data (the Data Subject shall have the right to obtain from the Data Controller the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the Data Subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement);
- erasure of data (the Data Subject shall have the right to obtain from the Data Controller the erasure of personal data concerning him or her, where provided for by relevant legislation);
- restriction of processing (the Data Subject shall have the right to obtain from the Data Controller restriction of processing where provided for by relevant legislation; where processing has been restricted, such personal data shall, with the exception of storage, be processed only with the Data Subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member state).

5.2 **Right to data portability**

Where processing is based on consent or a contract and is undertaken using automated equipment, the Data Subject shall have the right to receive the personal data concerning him or her in a structured, commonly used and machine-readable format, as well as the right to transmit those data to another data controller.

In exercising his or her rights to data portability, the Data Subject shall have the right to have the personal data transmitted directly from one data controller to another, where technically feasible.

The exercise of the right to data portability shall be without prejudice to the right to data erasure. This right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller.

5.3 Right to object

The Data Subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller, or processing necessary to pursue a legitimate interest of the Data Controller or of third parties, including profiling based on these provisions. Where personal data is processed for direct marketing purposes, the Data Subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the Data Subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes. Moreover, where personal data is processed for scientific or historical research or statistical purposes, the Data Subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

5.4 Exercise of rights

All requests relating to the exercise of the rights set out above may be sent to the Data Controller using the contact details indicated above.

6. RIGHT TO WITHDRAW CONSENT

6.1 Where processing of personal data or special categories of personal data is based on consent (art. 6, paragraph 1, subpart [a]) and/or art. 9, paragraph 2, subpart (a) of Regulation EU 2016/679, the Data Subject will have the right to withdraw his or her consent at any moment. This will be without prejudice to processing operations carried out before the withdrawal of consent. Consent may be revoked by following the instructions appearing in art. 6, supra, or by sending an express request to the Data Controller, using the contact information and addresses appearing supra.

7. RIGHT TO MAKE A COMPLAINT TO A SUPERVISORY AUTHORITY

7.1 Where the Data Subject believes that processing of his or her personal data violates relevant legislation, the Data Subject has the right to make a complaint to a supervisory authority, specifically one in the Member state in which they habitually reside or work or in the location in which the alleged violation took place.

8. NATURE OF DATA SUBMISSION; MANDATORY NATURE OF DATA SUBMISSION, AND POTENTIAL CONSEQUENCES OF FAILING TO SUBMIT DATA

Personal data. The submission of your personal data is a necessary condition for sending the newsletter. Any failure to provide your personal data will make it impossible for the Company to send you the newsletter as requested.