
WEB SITE PRIVACY NOTICE

This **Privacy Notice** (hereinafter, “Privacy Notice”) relates to the processing of your personal data while browsing the website www.albamilagro.com (hereinafter, the “Site”) carried out by Alba Milagro INTERNATIONAL S.p.A., with registered office at Via Corridoni 19, 20015 Parabiago (MI), VAT No. 11707620156, email info@albamilagro.com (hereinafter, the “Data Controller”), in compliance with current regulations on the protection of personal data, including EU Regulation 2016/679 (“GDPR”).

1. Identity and contact details of the Representative

Since the Data Controller is established in the EU territory, no representative has been appointed.

2. Contact details of the data protection officer

The Data Controller has appointed a Data Protection Officer (“DPO”) pursuant to Art. 37 GDPR. The DPO can be contacted at the address dpo@albamilagro.com.

3. Means of Processing

To complete the connection to the Site, some of your personal data are acquired. This set of data includes, for example:

- the IP address of the device you are using;
- the date and time of access;
- the type of web browser;
- the operating system used.

4. Purpose of Processing, Legal Basis, and Optionality of Consent

Your personal data will be processed for the following purposes:

- a) **Personal data processed during site navigation:** in this case, your personal data will be processed to allow you to correctly navigate the Site. For this purpose, the communication of your personal data is a contractual obligation, without which the services of the properly functioning Site could not be made available. In the absence of communication of personal data, the Data Controller cannot provide you with the Site’s services.

- b) **Personal data voluntarily provided via email or form:** in this case, your data will be processed by the Data Controller to follow up on your requests made voluntarily via form and/or email. The communication of your personal data for this purpose is purely optional. The legal basis for this processing is the legitimate interest of the Data Controller in following up and responding to your requests. In the absence of communication of personal data, the Data Controller cannot respond to requests.
- c) **Personal data processed for sending commercial communications:** in this case, your personal data will be processed to send you direct marketing communications, newsletters, advertising material, through traditional contact systems and automated computer systems, including commercial or promotional communications via email or SMS, or for market research and analysis. The communication of your personal data for this purpose is purely optional. The legal basis for this processing is your explicit consent to the processing of your personal data for this purpose. In the absence of your consent, the Data Controller will not proceed with sending commercial communications.
- d) **Personal data processed for profiling:** in this case, your personal data will be processed for activities to determine your habits and preferences through profiling treatments, to provide you with personalized service. The communication of your personal data for this purpose is purely optional. The legal basis for this processing is your explicit consent to the processing of your personal data for this purpose. In the absence of your consent, the Data Controller cannot provide you with personalized services.
- e) **Personal data processed for legal obligations:** in this case, your personal data will be processed for purposes related to legal obligations. The legal basis for processing is the legal obligation of the Data Controller to process personal data according to applicable regulations.

5. Automated Decision-Making and Profiling

If you consent to the processing of personal data to benefit from personalized services through profiling, personal data may be subject to automated decision-making, with a specific algorithm that will decide which communications are most suitable for your profile or which may be of most interest to you. The expected consequences of such processing include, for example, the sending of highly profiled commercial communications, the sending of discounts, the sending of invitations to events considered of interest, etc. In accordance with Article 22 of the GDPR, you have the right to:

- obtain human intervention in the decision-making process by the Data Controller;

- express your opinion;
- obtain an explanation of the decision made by the Data Controller;
- contest the decision itself.

6. Source of Personal Data

Only personal data provided in accordance with the Privacy Notice will be processed. The Data Controller will not process personal data from publicly accessible sources.

7. Recipients and Categories of Recipients of Personal Data

The recipients of personal data may include:

- communication companies that carry out commercial communication and profiling activities on behalf of the Data Controller, if the relevant consent has been given, which act as data processors;
- companies that offer information society services, including, in particular, those that offer hosting services;
- companies that carry out statistical and market research, if the relevant consent has been given.

8. Categories of Personal Data Processed

In accordance with this Privacy Notice, the following categories of personal data will be processed:

- navigation data necessary to complete your connection to the Site in accordance with the related purpose referred to in point 4;
- personal and contact data provided by you via email and/or form in accordance with the related purpose referred to in point 4;
- contact data and other data provided by you to receive commercial communications in accordance with the related purpose referred to in point 4;
- personal data related to your habits and preferences collected through profiling mechanisms to provide you with personalized services in accordance with the related purpose referred to in point 4;

- personal data necessary to comply with specific legal obligations in accordance with the related purpose referred to in point 4.

9. Data Transfer

The Data Controller intends to transfer personal data to entities established in a third country outside the European Union or to an international organization. Such entities may include, for example:

- communication companies that carry out communication activities on behalf of the Data Controller;
- providers of information society services;

The transfer of personal data to such entities, if established in a third country or an international organization, is carried out in the presence of an adequacy decision by the European Commission, which has verified that the third country, the territory, or one or more specific sectors within the third country, or the international organization in question, ensure an adequate level of protection of rights. In any case, the Data Controller, if deemed appropriate, reserves the right to conclude specific separate agreements that oblige such entities to adopt adequate security measures, including organizational measures, aimed at offering appropriate guarantees for your rights. Personal data may thus be transferred to the following countries: United States of America. To obtain a copy of such data or the place where they have been made available, it is sufficient to send the relevant request to the Data Controller, at the addresses indicated above.

10. Data Retention Period

In relation to the personal data processed in accordance with this Privacy Notice, the Data Controller adopts the following retention periods:

- navigation data necessary to complete your connection to the Site will be stored for **6 months from the moment of closing the browsing session**;
- personal and contact data provided by you via email and/or form will be stored for the **time strictly necessary to follow up exclusively on your possible requests**;
- contact data and other data provided by you to receive commercial communications will be processed and stored **until you revoke the consent previously given for this type of processing**. The Data Controller, once the request has been managed, will proceed without undue delay to delete all your personal data related to this processing;

- personal data related to your habits and preferences collected through profiling mechanisms will be processed and stored **until you revoke the consent previously given for this type of processing**. The Data Controller, once the request has been managed, will proceed without undue delay to delete all your personal data related to this processing;
- personal data necessary to comply with specific legal obligations will be **stored in compliance with the relevant legal provisions**.

11. Right to Object

As a Data Subject, you have the right to object as follows:

- the right to object at any time, for reasons related to your particular situation, to the processing of Personal Data concerning you under Article 6, paragraph 1, letters e) or f) of the GDPR. The Data Controller will refrain from further processing your personal data unless the Data Controller demonstrates compelling legitimate grounds for the processing that override your interests, rights, and freedoms or for the establishment, exercise, or defense of legal claims;
- if personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such purposes, including profiling to the extent that it is related to direct marketing;
- in the case of objection to processing for direct marketing purposes, personal data are no longer subject to processing for such purposes. You may object to the processing of your personal data for direct marketing purposes also only in part, for example by objecting only to the sending of promotional communications made through automated and/or digital tools, or to the sending of paper communications and/or receiving telephone communications;
- if your personal data are processed for scientific or historical research purposes or for statistical purposes under Article 89, paragraph 1 of the GDPR, for reasons related to your particular situation you have the right to object to the processing of personal data, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

12. Other Rights

The Data Controller also wishes to inform you of the existence of the following rights:

- **Right of Access:** You have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning you are being processed, and to access your personal data and specific information, in accordance with Article 15 of the GDPR.
- **Right to Rectification:** You have the right to obtain from the Data Controller the rectification of inaccurate personal data concerning you without undue delay. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement, in accordance with Article 16 of the GDPR.
- **Right to Data Erasure, including the right to withdraw consent:** You have the right to obtain from the Data Controller the erasure of your personal data without undue delay or to withdraw consent to processing, if the reasons defined by Article 17 of the GDPR apply. You have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- **Right to Restriction of Processing:** You have the right to obtain from the Data Controller the restriction of processing, when the conditions defined by Article 18 of the GDPR apply.
- **Right to Data Portability:** You have the right to receive your personal data provided to the Data Controller in a structured, commonly used, and machine-readable format, and you have the right to transmit those data to another controller without hindrance from the Data Controller indicated in this Privacy Notice, as provided by Article 20 of the GDPR.
- **Right to Object to Commercial Communications:** As a contracting party, you have the right to object at any time, free of charge, to receiving commercial communications from the Data Controller.
- **Right to Lodge a Complaint with the Supervisory Authority:** You have the right to lodge a complaint with the Data Protection Authority to report a violation of the regulations on the protection of personal data, in accordance with Article 77 of the GDPR.

13. How to Exercise Your Rights

You can exercise the rights indicated in the Privacy Notice by sending requests directly to the Data Controller at the email address info@albamilagro.com, or by sending the relevant communication by registered mail with return receipt to the registered office of the Data Controller as indicated above. You can lodge a complaint with the Data Protection Authority according to the procedures provided on the

official website, by addressing it to the contacts available at the address
<https://www.garanteprivacy.it/home/footer/contatti>.

14. Accessibility of the Privacy Notice

The Privacy Notice is available on the Site or at the premises of the Data Controller. If expressly requested, the Data Controller may provide the information orally, provided that your identity is verified, with a telephone request to the following number: +39 0331 495211.

15. Changes

The Data Controller may amend the Privacy Notice, also to adapt to changes in national and/or European legislation, or to technological innovations. Any new versions of the Privacy Notice will be reported on the Site. You are invited to periodically check the Privacy Notice. Any changes will be communicated to you through a pop-up on the Site or different methods and/or information tools.