

## Privacy Policy

Information pursuant to art. 13 of Regulation (EU) 679/2016 (GDPR) and Legislative Decree 196/2003 (Privacy Code) as amended by Legislative Decree 101/2018

### 1. Introduction

Your privacy and the security of your personal data are particularly important to **Finomnia SpA** (hereinafter also referred to as the “ **Data Controller** ” or “ **Company** ”). **Therefore, we collect and process them with the utmost care, while adopting specific organizational and technical measures to ensure the full security of their processing.** We therefore inform you, pursuant to art. 13 of European Regulation 679/2016 (“ **GDPR** ” or “ **Regulation** ”) and Legislative Decree 196/2003 (“ **Privacy Code** ”), as amended by Legislative Decree 101/2018 (collectively, the “ **Regulation** ”), that your personal data will be processed as indicated below while browsing this Website.

### 2. Data Controller and Data Protection Officer

Your personal data is processed by **Finomnia SpA** as Data Controller. To ensure maximum compliance, Finomnia SpA has appointed a *Data Protection Officer* (DPO) pursuant to Article 37 of the GDPR.

For any questions or requests related to the processing of your data, you can contact us by sending a request to the following addresses:

#### **Finomnia SpA**

**Registered office address:** Via Antonio Cechov, n. 50/2 – 20151 Milan

**Contact details Email Owner:** [privacy@finomnia.com](mailto:privacy@finomnia.com)

**DPO contact details email:** [dpo@finomnia.com](mailto:dpo@finomnia.com)

### 3. Category of Personal Data Processed

The personal data processed pursuant to this policy may include:

**a) Identification data**, such as, but not limited to, personal details such as name, surname, email address, and mobile number.

**b) Browsing data:** personal data implicitly transmitted during the use of Internet communication protocols (IP address, country of location, computer domain names, URI (Uniform Resource Identifier) addresses of resources requested on the Sites, the time of requests, the method used to submit requests to the server, the size of the file obtained in response to a request, the numerical code indicating the status of the response given by the server ( successful, error, etc.),

and so on). This information is collected by the Site and allows it to function. We inform you that this personal data is used by the Data Controller for the sole purpose of obtaining anonymous statistical information on the use of the Site, as well as to monitor its correct functioning and identify any malfunctions and/or abuse. This personal data persists for a maximum of seven days, unless it is necessary to identify the responsible parties in the event of hypothetical computer crimes against the Data Controller or third parties.

We may also process additional personal data that you voluntarily provide to us through the "**contact us**" section of this Website. In this case, please provide the personal data strictly necessary for this purpose. If this data belongs to third parties, we remind you that it is your responsibility to inform them of the processing described in this policy—including by providing/displaying it—and to request their consent, where necessary.

By registering your contact email and consenting to receiving communications for **commercial and marketing purposes**, you will automatically be added to a contact list to which messages and documents containing information of a commercial and promotional nature relating to the Company's activities may be sent.

For **cookies**, please refer to the specific **cookie policy** in the relevant section of the Website.

For the "**careers**" section, please refer **to the specific information in the relevant section of the Website**.

#### **4. Purpose and Legal Basis of the processing, nature of the provision**

In this section, for each purpose, we will provide you with the purpose of the processing, the related legal basis, the nature of the provision, and the retention period.

**a. Website Navigation.** Purpose: to enable navigation and consultation of the Website. Legal basis: legitimate interest of the Data Controller pursuant to Art. 6, paragraph 1, letter f) of the GDPR. Nature of the provision: necessary to enable navigation of the Website. Failure to provide data will make it impossible to navigate the Website. Retention period: for the entire duration of the browsing session and for a maximum period of seven days, without prejudice to a further period if necessary to detect any cybercrimes.

**b. Contact information.** Purpose: to contact the Data Controller via the appropriate section of the Website. Legal basis: to respond to your request pursuant to Art. 6, paragraph 1, letter b) of the GDPR (execution of pre-contractual or contractual measures adopted at the request of the data subject). Nature of the provision: necessary to contact the Data Controller. Failure to provide personal data, or partial provision of such data, may make it impossible for the Data Controller to respond adequately. Retention period: for the entire duration necessary to respond to your requests and for a maximum period of two years once the Data Controller has responded.

**c. Legal obligations.** Purpose: Personal Data collected for other purposes will also be processed to fulfill the legal obligations to which the Data Controller is subject. Legal basis: Art. 6, paragraph 1, letter c) of the GDPR, as processing is necessary to fulfill the legal obligations to

which the Data Controller is subject. Nature of the provision: once the data has been provided for other purposes, it will also be processed to fulfill such legal obligations. Retention period: in accordance with the obligations imposed by the Regulations and in any case for a maximum period of ten years from the last contact with the Data Controller. Your personal data may be processed if necessary and after your provision for the purposes set out above, to **ascertain, exercise, or defend a right in court**, based on the data controller's legitimate interest pursuant to Art. 6, paragraph 1, letter f) of the GDPR. In this case, your personal data will be retained until the conclusion of any proceedings or until the judicial order becomes enforceable, and in any case until it can produce its legal effects.

## 5. Data Controllers and Sub-Controllers pursuant to Art. 28 GDPR

Your data may also be processed by parties external to the organization, including, for example, the following categories: **(i) companies specializing in IT services; (ii) carefully selected webmaster companies** that offer adequate guarantees of compliance with data processing regulations.

These parties have been appointed as Data Processors and, where applicable, Sub-processors pursuant to Article 28, paragraphs 1 and 2 of the GDPR, and are required to carry out their activities according to the specific instructions given by the Data Controller and under its supervision. The complete list is available upon request by the data subject at one of the Data Controller's or DPO's contact points indicated in this policy.

## 6. Recipients of personal data

Your personal data may be processed, within the Data Controller's organizational framework, by persons authorized by the Data Controller (Article 29 GDPR) or designated (Article 2 quaterdecies of Legislative Decree 196/2003) to process such data, who will act on the basis of specific directives and instructions from the Data Controller. Your personal data will not be disclosed to third parties for their own purposes and will not be disseminated in any way. Your data, where necessary, may be disclosed to law enforcement and judicial and administrative authorities, in accordance with the law, for the detection and prosecution of crimes, the prevention and protection from threats to public safety, as well as to allow the Data Controller to exercise or defend its own rights or those of third parties before the competent authorities, as well as for other reasons related to the protection of the rights and freedoms of others.

## 7. Data transfer outside the EU

The Data Controller does not transfer your data to countries outside the European Economic Area.

If any third parties are based or use cloud services in countries outside the European Union, we inform you that these countries have been verified as offering an adequate level of data protection, as established by specific decisions of the European Commission. The transfer of personal data to third parties residing or located in countries outside the European Union that do not ensure adequate levels of protection will be carried out only with the data subject's consent or following the execution of specific agreements between the Company and such third parties containing safeguard clauses and appropriate data protection safeguards—so-called "standard contractual clauses"—also approved by the European Commission, or if the transfer is necessary for the conclusion and performance of the contract between the Company and the data subject or for the management of their requests.

## 8. Rights of the interested party

We inform you that you have the following rights in relation to the personal data covered by this privacy policy, as provided for and guaranteed by the Regulation:

> **Right of access and rectification** (Articles 15 and 16 of the Regulation): You have the right to access your personal data and to request that it be corrected, amended, or supplemented. If you wish, we will provide a copy of the data we hold about you.

> **Right to erasure** (Article 17 of the Regulation): In the cases provided for by applicable law, you may request the erasure of your personal data. Once we receive and review your request, we will cease processing and erase your personal data, if deemed legitimate.

> **Right to restriction of processing** (Article 18 of the Regulation): You have the right to request restriction of processing of your personal data in the event of unlawful processing or if the accuracy of the personal data is contested by the data subject.

> **Right to data portability** (Article 20 of the Regulation): You have the right to request that the Data Controller provide your personal data for the purpose of transmitting it to another Data Controller, in the cases provided for in the aforementioned article.

> **Right to object** (Article 21 of the Regulation): You have the right to object at any time to the processing of your personal data carried out on the basis of our legitimate interest, explaining the reasons justifying your request; before granting your request, the Company will evaluate the reasons for your request.

> **Right to lodge a complaint** (Article 77 of the Regulation): You have the right to lodge a complaint with the competent Data Protection Authority if you believe that a violation of your rights regarding the processing of your personal data has occurred or is occurring. You can exercise your rights at any time by contacting the Data Controller and/or the DPO at the contact details indicated in this policy.

## 9. Technical security measures pursuant to art. 32 GDPR

The Company adopts appropriate and preventive security measures to safeguard the confidentiality, integrity, completeness, and availability of the data subject's personal data. Technical, logistical, and organizational measures are implemented to prevent damage, loss, including accidental loss, alteration, improper, and unauthorized use of the processed data.

#### **10. Changes to this policy**

This privacy policy may be subject to changes and additions over time, as necessary due to new regulatory changes regarding personal data protection, or to the evolution/modification of the Company's operations.

#### **Information update**

This information is updated in January 2026