



Seven S.p.A.
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PRIVACY POLICY

(Information notice pursuant to Article 13 on the EU General
Data Protection Regulation 2016/679 (GDPR))

SEVEN S.p.A. with registered office in via Fornacino 96, 10040 Leini (TO), Italy, undertakes to continuously protect the on-line privacy of its website's users.

Personal data sources and Data Controller

This document was drawn up pursuant to Article 13 of EU Regulation 2016/679 (hereafter referred to as the "Regulation") to provide you with information on our privacy policy. The methods employed to process the personal data of website users and cookies (see cookie policy) and how personal data is managed when using one of our websites www.seven.eu; www.invicta.it (hereinafter referred to as the "Website") are described in this document. Any information or data provided by you or acquired as a result of your use of **SEVEN S.p.A.**'s services, - for example: account creation, contact us, newsletters, etc., hereinafter referred to as the "Services" -, will be processed in accordance with the provisions of the Regulation and with confidentiality obligations inspiring **SEVEN S.p.A.**'s business activities.

In accordance with the provisions of the Regulation, **SEVEN S.p.A.** will process personal data observing principles of lawfulness, fairness, transparency, purpose and storage limitation, data minimisation, accuracy, integrity and confidentiality.

SEVEN S.p.A., with registered office in via Fornacino 96, 10040 Leini (TO), Italy, as defined above, is the Data Controller of all data processing carried out by means of the Website. The Data Controller can be contacted to obtain any information whatsoever regarding the processing of personal data.

The Data Protection Officer (hereinafter referred to as the "DPO") can be contacted at the following e-mail address: dpo@sevenspa.it.

This information notice is only for this Websites mentioned above (www.seven.eu ; www.invicta.it) and not for other websites may be consulted by the user by means of links. Please refer to the relevant sections of the Website where specific information can be found and to any requests for consent to individual processing.

Types of data

We would like to inform you that, subsequent to browsing the Website, **SEVEN S.p.A.** will process personal data (Article 4(1) of the Regulation) hereinafter referred to as the "Personal Data".

In particular, the following Personal Data will be processed by means of the Website:

1. Navigation data

During their normal operation, the IT systems and software procedures operating this site acquire certain personal data, the transmission of which is implicit in the use of Internet communications protocols. This information is not collected in order to be associated to identified data subjects, however, due to the nature of the same, said information may allow for users to be identified as a result of processing and association with data held by third parties. This category includes the IP addresses or domain names of the computers used by the users to connect to the website, URI (Uniform Resource Identifier) form addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the reply given by the server (done, error, etc.) and other parameters concerning the user's operating system and computer environment. This type of data is used with the sole purpose of obtaining anonymous statistical information concerning use of the website and to check that the website operates correctly (see cookie policy), as well as to identify anomalous activity and/or abuse. The data is deleted immediately after processing. The data may be used by the competent authorities to ascertain liability in the event of hypothetical computer crimes against the website.

2. Data provided voluntarily by data subjects

With the exception of that specified with regard to navigation data, users are free to choose whether to provide the personal data contained in any request forms on the Website (e.g. to activate the newsletter, site registration, contact form, purchase products, etc.). However, failure to provide such data may render obtaining the relevant service impossible. In these instances, only the information necessary for the service requested will be required (for details, please refer to the specific information notices).

When using certain Services on the Website, the Personal Data of third parties may be processed as a result of you sending said data to **SEVEN S.p.A.**. In such cases, you are the independent data controller of said data and assume all legal obligations and



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liability in relation to the same. In this context, you will indemnify **SEVEN S.p.A.** with regard to any dispute, claim, request for compensation for damage consequent to data processing, etc., received by **SEVEN S.p.A.** from third parties whose Personal Data has been processed by means of your use of the Website in violation of applicable legislation on the protection of personal data. In any event, if you provide or otherwise process Personal Data of third parties when using the Website, you hereby warrant - assuming all relevant liability - that any such processing is based on an appropriate legal basis pursuant to Article 6 of the Regulation that legitimises the processing of the information in question.

Purposes, legal basis, optional nature of processing, personal data retention periods

Your personal data will be processed for the following purposes:

- a) to perform the contract and/or take pre-contractual steps (e.g. creation of an account as a new customer on the website).**
The **legal basis** for the processing "a" of your personal data is the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6(1)(b) of the Regulation).
- b) to comply with legal obligations (for example, to manage product warranty activations).**
The **legal basis** for the processing "b" of your personal data is compliance with a legal obligation that the Controller is subject to (Article 6(1)(c) of the Regulation).
- c) to manage complaints (for example, to respond to complaints, reports or disputes).**
The **legal basis** for the processing "c" of your personal data is the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6(1)(b) of the Regulation) and compliance with a legal obligation that the Controller is subject to (Article 6(1)(c) of the Regulation) - (see specific information).
- d) to manage disputes**
The **legal basis** for the processing "d" of your personal data is the pursuit of the legitimate interests of the Controller, directed at defending a right in administrative or court procedures (Article 6(1)(f) of the Regulation).
- e) to manage sending requested information via the contact form**
The **legal basis** for the processing "e" of your personal data is the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6(1)(b) of the Regulation).
- f) to manage your request made to the freephone number (e.g. to manage a request for information).**
The **legal basis** for the processing "f" of your personal data is the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6(1)(b) of the Regulation) - (see specific information).
- g) to enable participation in prize transactions where envisaged.**
The **legal basis** for the processing "g" of your personal data is the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6(1)(b) of the Regulation) - (see specific information).

In accordance with the principle of data minimisation referred to in Article 5, paragraph 1, letter c) of the GDP, your personal data for the purposes indicated above, from letter a) to letter g), will be stored in order to follow up the management of the contract and/or service retained until consent is withdrawn. This is without prejudice to legal obligations set out in applicable legislation to retain your data for longer periods, including the provisions of Article 2946 of the Italian Civil Code. Further information is available from the Data Controller.



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You may decide whether to consent to the processing of your personal data for the aforementioned purposes, from letter "a" to letter "g" however, without your consent, we will be unable to enter into the contract and/or activate the services provided by the Site.

Your personal data will also be processed, upon receipt of your specific consent to the same, for the following purposes:

- h) **of send promotional and marketing communications, including sending newsletters using digital tools (e-mail, push notifications) or traditional tools (telephone with operator);** it should be noted that, pursuant to the General Provision of the Italian Personal Data Protection Authority "Guidelines on promotional activities and the battle against spam" of 4 July 2013, the Controller collects a single consent for the marketing purposes described herein; if, in any event, you wish to object to the processing of your personal data for marketing purposes with the means indicated herein and withdraw your consent, you may contact the Controller at any time at the addresses indicated in this information notice, without prejudice to the lawfulness of any processing based on your consent provided prior to the withdrawal of the same.

The legal basis for personal data processing "h" is the provision of consent by the data subject to the processing of their personal data (Article 6(1)(a) of the Regulation).

Your personal data for the above purpose will be stored until you withdraw your consent or request to unsubscribe - (see specific information).

You may decide whether to consent to the processing "h" of your personal data for the aforementioned purpose, however, without your consent, you will not be able to register for the service.

Personal data recipients

Your Personal Data may be shared, for the purposes mentioned above, with:

- persons authorised by **SEVEN S.p.A.** to process the Personal Data required to perform activities strictly related to the furnishing of the Services, who undertake to maintain confidentiality or who have an appropriate legal obligation to maintain confidentiality (e.g. employees and system administrators).
- third parties responsible for the management of the website typically acting in their capacity as Data Processors ("to obtain a full updated list of Data Processors, please write to servizio.privacy@sevenspa.it).
- subjects, bodies or authorities to whom disclosure of your personal data is mandatory in accordance with provisions of law or orders from authorities.

Transfer of personal data

The **SEVEN S.P.A.** informs you that your personal data is also transferred to countries outside the EU and the EEA. These countries may not be considered by the European Commission* as countries ensuring an adequate level of protection of personal data. Therefore, when we transfer your personal data outside the EU, we will take appropriate safeguards in accordance with the requirements of applicable EU and Italian law to ensure that your personal data is adequately protected.

In particular, your data may be communicated to Canada, as a country deemed adequate pursuant to Article 45 of EU Regulation 2016/679; to Australia, Colombia, the United States, as Standard Contractual Clauses have been stipulated, pursuant to Article 46 of EU Regulation 2016/679.

In relation to the personal data subject to the aforementioned transfers to non-EU territories, the data subject may obtain information by making a request to the Data Controller by sending a communication to the following email address servizio.privacy@sevenspa.it.



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* The updated list of the non-EEA adequate countries deemed adequate by the European Commission can be obtained on the website: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en

Your privacy rights pursuant to Article 15 et seq. of the Regulation

As a Data Subject, you may, at any time, assert the following rights:

- data subject's right of access [art. 15 of the EU Regulation] (the possibility to be informed about the processing carried out on one's Personal Data and possibly receive a copy of it);
- the right to rectification of one's Personal Data [Art. 16 of the EU Regulation] (the right to have inaccurate Personal Data relating to him/her rectified);
- the right to erasure of one's Personal Data without undue delay ("right to be forgotten") [Art. 17 of the EU Regulation] (the data subject has, as well as will have, the right to erasure of his or her own data);
- right to restriction of processing of one's Personal Data in the cases provided for in Article 18 of the EU Regulation, including in the case of unlawful processing or contestation of the accuracy of Personal Data by the data subject [Article 18 of the EU Regulation];
- right to data portability [art. 20 of the EU Regulation], the data subject may request in a structured format his/her Personal Data in order to transmit it to another controller, in the cases provided for by the same article;
- the right to object to the processing of one's Personal Data [Art. 21 of the EU Regulation] (the data subject has, as well as will have, the right to object to the processing of his/her Personal Data)
- the right not to be subjected to automated decision-making processes [Art. 22 of the EU Regulation] (the data subject has, as well as will have, the right not to be subjected to a decision based solely on automated processing).

With regard to the purposes for which consent is required, the Data Subject may withdraw his/her consent at any time and the effects shall take effect from the moment of withdrawal, without prejudice to the time limits provided for by law. In general terms, revocation of consent is effective only for the future.

The aforementioned rights may be exercised in accordance with the Regulation by sending an e-mail to servizio.privacy@sevenspa.it. or to the address of the DPO (Data Protection Officer) dpo@sevenspa.it.

In accordance with Article 19 of the EU Regulation, the Data Controller shall proceed to inform the recipients to whom the personal data have been disclosed, of any rectification, erasure or restriction of processing requested, where this is possible.

Right to lodge a complaint

If you believe that your rights have been compromised, you have the right to lodge a complaint with the Data Protection Authority.

Amendments

This privacy policy shall be effective from 2022/02/02. **SEVEN S.p.A.** reserves the right to amend or simply update the content of this policy in part or in full, including as a result of amendments to applicable legislation. **SEVEN S.p.A.** will inform you of any such amendments as soon as they are introduced. Any such amendments will be binding as soon as they are published on the Website.

SEVEN S.p.A. therefore invites you to consult this section regularly to view the most recent and updated version of its privacy policy, in order to be constantly updated on data collection and on the use of the same by **SEVEN S.p.A.**

(Version dated 2022_02_02)