

### INFORMATION PURSUANT TO ART. 13 AND 14 OF REG. (EU) 2016/679 ("GDPR")

Amilon provides below the information required by the GDPR about the processing of personal data related to registration on the www.ideashopping.com portal <u>("Portal")</u> and the use of the related services by users ("**User(s)**") – in particular, the purchase of gift cards and ideaShopping (also in favor of a third party, "**Beneficiary"**") – as better governed by the general conditions of contract (conditions of use and conditions of sale, available in the footer of the Portal).

### 1. Sources and categories of data processed – nature of the provision

As indicated in the conditions of use, the User, in order to use his Shopping idea on the Portal, must:

- 1. register to the same (i) by filling out the appropriate form, with the insertion of name and surname, e-mail address, telephone number, province of residence, as well as creating a password (optionally being able to add the address of residence, age group and gender) or (ii) authenticating via cd. "social login", i.e. using your Facebook or Google account (in this case, the reference provider will transmit the following data to Amilon: e-mail address, alphanumeric identification code, date of registration to the Portal, reference provider and last access to the latter), and then log in using your credentials, or
- 2. access in "guest" mode; in this case you will have to enter the "code" of your ideaShopping, as well as provide the number of your mobile phone, where you will receive the security code for identity confirmation.

If the User limits himself to purchasing an ideaShopping (also possible without authentication), he must indicate only the e-mail address to which he should deliver it.

If the User decides to give the Gift Card / ideaShopping to a Beneficiary, he/she will provide the data to Amilon for delivery purposes (name and surname, e-mail address), as well as specifying his/her data (name and surname, e-mail address).

Amilon also processes Users' credit card details (and communicates them to the cd. "acquirer", i.e. the payment service provider that manages the payment, acting as an independent data controller), as well as purchase information.

Information on the processing of navigation data and those relating to the use of cookies can be consulted in the privacy and cookie policy made available in the cookie banner that appears at the first access and in the footer of the Portal.

#### 2. Identity and contact details of the data controller

The data controller is **Amilon S.r.l.,** Tax Code and VAT 05921090964, with registered office in via Natale Battaglia n. 12, Milan, e-mail address privacy@amilon.eu ("**Amilon**" or "**Data Controller**").

## 3. Contact details of the Data Protection Officer (DPO)

The DPO can be contacted at the e-mail address dpo-ext@amilon.it.

### 4. Purpose of processing, legal bases and data retention times

	WHY IS PERSONAL DATA PROCESSED?	What is the condition that makes the processing lawful?	HOW LONG DO WE KEEP PERSONAL DATA?
a.	To allow registration on the Portal and the use of the related services, also as a "guest" User.	The execution of a contract of which the User is a party (or for which the contract is concluded, in the case of the Beneficiary).	For the entire duration of the contractual relationship with Amilon (registration on the Portal) and, as an
b.	To establish, exercise or <b>defend the</b> rights of Amilon.	The pursuit of the <b>legitimate interest of the</b> Data Controller.	ordinary limitation period, for the following 10 years.
	In order to mitigate the risk of fraud in payments on the Portal, the following are envisaged:		In the event of litigation, the data are kept until the deadlines for the appeal are exhausted.
	<ul> <li>identification of Users (via confirmation via mobile phone);</li> </ul>		The data collected for anti-fraud purposes are kept for 10 years, as an ordinary limitation period.
	<ul> <li>carrying out checks on the credit card data entered during the purchase by the User.</li> </ul>		
C.	To <b>fulfill administrative-accounting</b> , <b>tax and other legal obligations</b> , in accordance with the requirements of current legislation.	The fulfillment of a legal obligation to which the Data Controller is subject.	The data will be kept for 10 years, as a general ten-year retention period prescribed by law.



d. To send — to the e-mail address provided by the User — promotional communications regarding products supplied by Amilon similar to those purchased on the Portal (e.g. regarding the addition of a new gift card in the catalogs of Amilon ecommerce sites or relating to a particular discount applied to a certain brand of gift cards sold therein).

The cd. "soft spam" pursuant to art. 130, c. 4 of d. lgs. 196/2003 ("Privacy Code").

Until the possible opposition of the interested party (by clicking on the "unsubscribe" link present in each communication).

To carry out profiled marketing activities, i.e. the elaboration of a user profile on the basis of the data provided by the same (during registration and purchase) in combination with information relating to navigation on the Portal (derived, in particular, from online clicks on certain products / sections) collected through cookies, in order to allow Amilon to offer promotional messages and / or online content more in line with this **profile**, through automated contact methods (such as personalized emails) and / or online advertising banners.

The **User's consent**, optional and revocable at any time.

The data will be kept for 3 years, without prejudice to the User's right to object (including by clicking on the "unsubscribe" link in each communication) or to revoke consent.

Once the storage terms indicated above have elapsed, the data will be destroyed, deleted or made anonymous, compatibly with the technical timing of cancellation and backup.

### 5. Provision of data

As explained above, the provision of data marked with an asterisk is necessary for registration on the Portal.

The insertion of the telephone number is necessary to use the services of the Portal in "guest" mode.

Therefore, failure to provide the aforementioned data will make it impossible for Users to use the services offered by Amilon on the Portal.

# 6. Categories of data recipients

The data may be communicated to other third parties operating as independent data controllers, such as, for example, public authorities and professional firms, entitled to receive them, as well as the cd. acquirer at payment as reported above (par. 1).

The data may also be processed, on behalf of the Data Controller, by third parties, designated as data processors pursuant to art. 28 of the GDPR, which carry out activities functional to the pursuit of the aforementioned purposes (e.g. IT service providers, customer care and marketing, providers of control services for anti-fraud purposes).

Furthermore, the data are processed by Amilon employees - belonging to the company departments responsible for pursuing the aforementioned purposes - who have been expressly authorized to process and who have received adequate operating instructions.

### 7. Rights of the interested parties

The interested parties (ie the subjects to whom the data refer; that is, User and Beneficiary) can exercise the rights referred to in Articles. 15-22 of the GDPR, by sending a communication to the contact points indicated in par. 2.

In particular, the interested parties can obtain from the Data Controller confirmation that personal data concerning them are being processed and, in this case, access to them and to the information referred to in art. 15, the correction of inaccurate data, the integration of incomplete data, the deletion of data in the cases provided for by art. 17, the limitation of processing in the cases provided for by art. 18 of the GDPR, as well as oppose, for reasons related to their particular situation, the processing carried out for the legitimate interest of the owner; Furthermore, if the processing is based on consent or contract and is carried out with automated tools, they may request to receive the data in a structured format, commonly used and readable by automatic device, as well as, if technically feasible, to transmit them to another holder without hindrance ("right to portability").



As indicated above, interested parties may, at any time, revoke the consent given and oppose the processing for direct marketing purposes (also by clicking on the "unsubscribe" link in each e-mail communication).

In any case, data subjects have the right to lodge a complaint with the competent supervisory authority in the Member State where they habitually reside or work or in the State where the alleged infringement occurred.