

PRIVACY POLICY

This Privacy Policy (the "**Policy**") is intended to provide information on how Madeinadd S.r.l. processes the personal data of individuals when they browse as users on the platform https://www.madeinadd.com (the "**Platform**") and when they use the services offered therein (collectively referred to as the "**Data Subjects**").

This Policy serves as a privacy notice to Data Subjects pursuant to Articles 12 et seq. of Regulation (EU) 2016/679 (the "GDPR"), and applies exclusively to the Platform, excluding any other websites that may be accessed by Data Subjects via links contained therein.

This Policy may be amended due to changes in data processing practices or regulatory updates; Data Subjects are therefore encouraged to consult this page periodically.

1. DATA CONTROLLER AND USE OF PERSONAL DATA

With respect to the Platform, the Data Controller is Madeinadd S.r.l. (the "**Controller**"). Details on how to contact the Controller and exercise relevant rights are provided in paragraph 8 of this Policy.

The Controller collects data and information in an accurate, relevant and proportionate manner, without requesting unnecessary information.

The Controller may also collect personal data via third parties acting as independent data controllers and may use automated decision-making processes, again via third parties, for the purpose of executing the contract between the Controller and the Data Subjects.

2. PURPOSES AND METHODS OF DATA COLLECTION

2.1 Use of the Platform

Like many websites, the Platform uses log files that store information collected automatically during visits by Data Subjects. The IT systems and software procedures responsible for the Platform's operation acquire, during normal use, certain data whose transmission is implicit in Internet communication protocols. This data is not collected with the intention of being associated with identified data subjects, however, by its very nature, it could, through processing and association with data held by third parties, allow for the identification of the data subjects. Examples include:

- Internet Protocol (IP) address
- Browser type and device parameters used to connect
- Name of Internet Service Provider (ISP)
- Date and time of visit
- Referring and exit web pages
- Number of clicks (if applicable)





These data are processed automatically and collected in aggregate form solely to verify the proper functioning of the Platform. Processing is based on the Controller's legitimate interests (Art. 6(1)(f) GDPR).

Data are retained for the time necessary to fulfil the stated purposes.

2.2 Provision of Platform Services

The Controller processes personal data to enable Data Subjects to use the Platform, register, save orders, and purchase services. Data collected may include:

- IP address
- Registration details (email and password)
- Business information (email, company name, VAT number)
- Shipping address (name, surname, company address)
- Payment information (e.g. last 4 digits of company credit card)

The legal basis for the collection and use of the data is the performance of a contract to which the Data Subjects are party, or the taking of pre-contractual measures at the request of the Data Subjects prior to entering into a contract (Art. 6(1)(b) GDPR).

Registration data are processed until account deactivation, which may be requested via the contact details below. Purchase data are processed until administrative and accounting formalities are completed, then archived in accordance with local tax regulations (ten years).

2.3 Platform and Account Security

Personal data are processed to ensure the security of the Platform and registered accounts (e.g. password recovery).

The legal basis for the collection and use of such data is the Controller's legitimate interest in ensuring the security of the Platform's operation and of user accounts (art. 6 (1) (f) del GDPR).

2.4 Marketing Activities

Personal data are processed for marketing purposes via SMS, phone calls, email, or social networks (e.g. LinkedIn).

The lawful basis for the collection and use of such data is the Data Subjects' consent, pursuant to (Art. 6(1)(a) GDPR.)

If the Controller uses an email address previously provided during a prior service, further consent may not be required, provided the services are similar. The legal basis in such cases is Art. 130(4) of Legislative Decree 196/2003.

Data are retained for no more than two years from the date of collection and Data Subjects can withdraw consent at any time. Processing prior to withdrawal remains lawful, subject to paragraph 2.6.

2.5 Newsletter Subscription

Personal data are processed for sending newsletters via email.





The legal basis is the Data Subjects' consent (Art. 6(1)(a) GDPR).

Data are retained for no more than two years, with the right to withdraw consent at any time, without affecting prior lawful processing and what is provided for in paragraph 2.6.

2.6 Legal Obligations

Personal data are processed to comply with legal obligations or authority requests (e.g. tax matters), to manage Data Subjects' requests regarding their data, or to protect the Controller's rights.

The legal basis for the collection and processing of such Data is compliance with legal obligations, pursuant to (Art. 6(1)(c) GDPR).

Data are retained for the time strictly necessary for the above purposes and in any case for the statutory limitation period (ten years).

3. DATA RECIPIENTS

Personal data may be disclosed, for the above purposes, to the following categories of recipients:

- Employees and collaborators of the Controller
- External companies and professionals working with the Controller
- Commercial partners
- Authorities and, more generally, public or private entities carrying out public functions, to whom the disclosure
 of data is required under specific legal provisions.

These parties may act as independent data controllers, data processors under Art. 28 GDPR, or as persons authorised to process personal data pursuant to Art. 29 GDPR. A full list is available upon request via the contact details in paragraph 8.

4. DATA TRANSFER OUTSIDE THE EEA

Personal data are generally processed within the European Economic Area (EEA) and Switzerland, which benefits from an adequacy decision by the European Commission.

Where necessary to achieve the purposes outlined above, data may be transferred to companies located outside the EEA. Some jurisdictions may not offer the same level of data protection. In such cases, the Controller undertakes to ensure that the data is processed with the utmost confidentiality by implementing appropriate safeguards for the protection of personal data. These safeguards include, in the absence of adequacy decisions, the conclusion of agreements that ensure an adequate level of protection and/or incorporate the standard contractual clauses adopted by the European Commission.

5. COOKIES

The Controller uses cookies to enhance user browsing experience. For further details, please refer to our Cookie Policy:





https://www.madeinadd.com/it-it/cookie-policy/.

6. RIGHTS OF DATA SUBJECTS

Data Subjects may exercise all rights provided under Articles 15–22 of the GDPR by contacting the Controller at the addresses specified in paragraph 8.

In particular, the Data Subject has the right to:

- Obtain confirmation as to whether personal data concerning them are being processed, even if not yet recorded, and to receive such data in an intelligible form;
- Obtain, among other things, information regarding: (i) the origin of the personal data; (ii) the purposes and methods of processing; (iii) the identity of the Controller; (iv) the recipients or categories of recipients to whom the personal data may be disclosed or who may become aware of them, including as data processors; (v) the categories of personal data concerned; (vi) where possible, the envisaged retention period or the criteria used to determine it; (vii) the existence of the right to request rectification, erasure, or restriction of processing; (viii) the existence of the right to object to processing; (ix) the right to lodge a complaint with the supervisory authority; (x) the existence of automated decision-making, including profiling;
- Obtain: (i) the rectification or integration of personal data; (ii) restriction of processing, where applicable; (iii) portability of personal data, where applicable; (iv) confirmation that the operations referred to in points (i) and (ii) above, as well as erasure as outlined below, have been brought to the attention of those to whom the personal data were disclosed or transmitted, except where this proves impossible or involves a disproportionate effort in relation to the protected right;
- Obtain the erasure of personal data in the cases provided by law;
- Withdraw consent to the processing of personal data (opt-out), without prejudice to the lawfulness of processing carried out prior to withdrawal;
- Object, in whole or in part: (i) on legitimate grounds, to the processing of personal data, even if relevant to the purpose of collection; and (ii) to the processing of personal data for the purpose of sending communications
- Lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali).

7. DATA RETENTION PERIOD

Data are processed and retained for the duration necessary to achieve the purposes for which they were collected (see paragraph 2).

Upon expiry of the retention period, personal data will be deleted, and the ability to exercise rights related to their processing will consequently cease.

8. CONTACT DETAILS

For any questions regarding the collection and use of personal data during use of the Platform, or for information about your rights, please contact our Data Protection Officer(s) at the following address: dataprotectionteam@madeinadd.com, or at the Controller's registered office in Milan, Via Copernico No. 38, 20125.

