

## REGULATION (EU) 2016/679 ON THE PROCESSING OF PERSONAL DATA - ARTICLE 13

### Privacy Policy - WEB Estimate

**Kruso Kapital S.p.A.** with registered office at Via Cappuccio, 14 - 20123 Milan, VAT No. 10753220960 (hereinafter the "**Data Controller**" or the "**Company**"), in its capacity as Data Controller; pursuant to Legislative Decree 196/2003, as amended by Legislative Decree 101/2018 (hereinafter the "**Privacy Code**") and Article 13 of Regulation (EU) 2016/679 (hereinafter the "**GDPR**"), informs you that your data will be processed in accordance with the principles of fairness, lawfulness, and transparency, in compliance with the purposes and methods set out below, and collected to the extent necessary and accurate for processing.

The contact details of the Data Protection Officer; DPO (Data Protection Officer), are as follows: [privacy@krusokapital.com](mailto:privacy@krusokapital.com); by writing here you may exercise your rights under Article 15 et seq. of the GDPR.

#### 1 Purpose of processing

With this information notice, the Data Controller intends to provide you with some information on the processing of your personal data resulting from the completion of the form on the Company's website "Evaluate your valuables", which is necessary in order to use the services provided or to obtain an automatic and indicative estimate of your valuables.

Processing of personal data means any operation or set of operations which is performed on personal data or sets of personal data, whether or not stored in a database, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, processing, selection, blocking, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, comparison or interconnection, restriction, erasure or destruction.

##### 1.1 Type of data collected from the user

To provide you with the requested service, we ask you to provide us with the following data:

- name
- surname
- e-mail address

#### 2 Purposes of processing and legal basis

The personal data you provide will be processed by the Data Controller for the following purposes:

##### 2.1 Purposes related to the provision of the services you have requested, i.e.:

- enable the user to receive an automatic, indicative estimate of their valuables by e-mail and to check the feasibility of accessing the remote pledge process;

The provision of personal data necessary for these purposes is not compulsory, but refusal to provide such data will make it impossible for the Company to provide the service. The legal basis for the processing is the performance of pre-contractual measures (Article 6(1)(b) GDPR).

##### 2.2 Marketing purposes:

- Carrying out direct and indirect marketing activities for the promotion of the Company's and its subsidiaries' products and services, including the organisation of events, both through the use of automated calling or communication systems without the intervention of an operator and electronic communications (e-mail, SMS, MMS or other similar means), and through postal mail and telephone calls made by an operator. The provision of the data necessary for these purposes is optional and the legal basis for the processing is the consent of the data subjects. The lack of consent will have no impact whatsoever on the relations between the parties as the consent can only lead to an improvement in the service. The consent may be withdrawn at any time by notifying the Data Controller.

#### 3 Processing methods

The processing of your personal data will be carried out by means of the operations listed in Article 4(2) of the GDPR, namely: collection, recording, organisation, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, erasure and destruction of data.

Your personal data will be subject to both paper and electronic and/or automated processing.

#### 4 DATA ACCESS AND DISCLOSURE

Your data may be made accessible, for the purposes set out in points 2, to:

- employees and contractors of the Data Controller in their capacity as authorised persons and/or internal data processors and/or system administrators;
- third party companies or other entities (e.g. ICT companies, consultants, web platform providers, etc.) that carry out activities on behalf of the Data Controller, in their capacity as external data processors.

The Data Controller may also disclose your data for the above-mentioned purposes to:

- Supervisory bodies, Judicial Authorities, Police Bodies, Public Entities and all those parties to which disclosure is mandatory by law for the fulfilment of the aforementioned purposes. These parties will process the data in their capacity as independent data controllers.

Your data will not be disseminated.

## 5 Storage period

We will store your data:

- for the period strictly necessary to process your request for information;
- until such time as we receive withdrawal of your consent for the direct and indirect marketing purposes to which you have given specific consent.

The data will be erased or made anonymous at the above-mentioned deadlines, and will only be processed for a longer period if this is expressly required by law, or to pursue a legitimate interest of ours or a third party, or if you become our customer.

## 6 Data Transfer

We normally process your data within the European Union; however, for technical or operational reasons, we may transfer data outside the European Union or the European Economic Area (so-called Third Countries). The Company assures as of now that the transfer will be carried out in accordance with the applicable legal provisions by concluding, if necessary, agreements guaranteeing an adequate level of protection and/or adopting the standard contractual clauses foreseen by the European Commission.

For further information, please contact the DPO at [privacy@krusokapital.com](mailto:privacy@krusokapital.com).

## 7 Rights of the data subject and how to exercise them

We inform you that you can exercise your rights under Article 15 et seq. of the GDPR at any time and if the conditions are met:

- obtain confirmation of the existence or non-existence of personal data concerning you and their copy in intelligible form;
- obtain the updating, rectification or completion of your data;
- request the erasure of your data, within the time limits provided for by law;
- object, in whole or in part, to the processing of your personal data;
- limit the processing, in case of a breach, request for rectification or objection;
- request portability of the electronically processed data, provided based on consent or a contract;
- withdraw consent to the processing of your data, where applicable;
- in relation to fully automated profiling, obtain human intervention from the Data Controller to express your point of view, and challenge the decision.

If you consider it appropriate, you may lodge a complaint with the Data Protection Authority.

To exercise your rights, you may contact the Data Controller or the DPO at the following e-mail address: [privacy@krusokapital.com](mailto:privacy@krusokapital.com).