DATA CONTROLLERS

The following companies act as Data Controllers, each in respect of the data for which it is responsible:

Argea SpA, with registered office at Piazza Affari 2, 20123 Milan (MI)
VAT and tax identification number 11215240968
Registered with the Milan Monza Brianza Chamber of Commerce under REA number MI-2587438

Botter spa
Single-member company
With registered office at via Luigi Cadorna, 17, 30020 Fossalta di Piave (VE)
VAT and tax identification number 00170720270
Registered with the Venezia Rovigo e Delta Lagunare Chamber of Commerce under REA number VE-92683

MGM Mondo del Vino spa
Single-member company
With registered office at via Seganti 73/F, 47121 Forlì (FC)
VAT and tax identification number 02120150400
Registered with the Romagna Forlì Cesena e Rimini Chamber of Commerce under REA number FO-242297

(hereinafter also referred to as the "Controllers")

CATEGORIES OF DATA PROCESSED, PURPOSES AND LEGAL BASIS OF PROCESSING

The following personal data are collected and processed: ordinary personal data (first name, surname, personal details, role within the company and contact details) relating to customer and supplier companies/entities, as well as their contact persons, employees, associates and subcontractors, which may be provided by those customers/suppliers; email addresses and any additional data provided by users who subscribe to the newsletter through the Controllers' websites (the e-commerce website and brand websites); data relating to interactions with newsletters, collected through tracking pixels and tracked links embedded in emails (message opening date and time, link clicks, type of email client and device used, and approximate location derived from the IP address), for the following purposes: a) pre-contractual activities and performance of the contractual relationship; b) administrative, accounting, tax and statutory obligations associated with invoicing and management of the contractual relationship; c) marketing purposes (sending commercial, promotional, advertising and marketing communications by email, including newsletters, and invitations to trade fairs and events by email); d) analysis of each recipient's interactions with newsletters through tracking pixels and tracked links, to record opens and clicks and make communications more relevant to the interests expressed (for example, by adjusting their content and frequency); e) compilation of aggregated and anonymous statistics on campaign performance (for example, the overall open rate), including in relation to recipients who have not given, or have withdrawn, the consent referred to in point d).

The legal bases for processing the data are therefore: performance of contractual obligations for the purposes referred to in point a); compliance with legal obligations for the purposes referred to in point b); consent for the purposes referred to in points c) and d), obtained through a single consent at the time of newsletter subscription and withdrawable at any time, including solely in respect of the purpose referred to in point d); and the Controllers' legitimate interest in measuring the overall effectiveness of their campaigns for the purposes referred to in point e), as the data are processed in aggregated and anonymous form and cannot be linked, even indirectly, to an individual recipient.

DISCLOSURE OF DATA TO THIRD PARTIES — DATA RECIPIENTS

The Controllers may disclose data processed for the above purposes to: i) internal personnel authorised to process the data; ii) external parties belonging to the following categories: external consultants and persons acting on their behalf; service providers (transport and/or shipping companies); banks, insurance companies and credit institutions; external companies providing support for marketing activities (including newsletter platform providers, such as MailUp, and communications and digital marketing agencies); supervisory bodies and authorities (customs); iii) other companies within the Argea Group.

TRANSFER OF DATA TO THIRD COUNTRIES

Transfers of data to third countries outside the EU will take place in accordance with the legislation in force at the relevant time. In particular, where any of the Controllers' service providers, such as newsletter platform providers, process data outside the European Economic Area, the transfer will be based on an adequacy decision of the European Commission or, in the absence of such a decision, on standard contractual clauses adopted by the European Commission. Further information on the safeguards adopted may be requested using the contact details provided in this privacy notice.

PROCESSING METHODS, DATA RETENTION PERIODS AND CRITERIA

Data will be processed in paper and digital formats. Data relating to purposes a) and b) will be processed by the Controllers for the period necessary to fulfil the above purposes and, thereafter, for the additional statutory limitation period applicable to the retention of contracts and administrative data and/or the defence of legal claims (ten years from the last use and/or an event interrupting the limitation period). Data processed for the marketing purposes referred to in point c) will be processed in digital format until consent is withdrawn and, in any event, for a maximum period of 2 years. Before that period expires, the Controller will ask the data subject to renew their consent and, if consent is not renewed, will delete the email contact. Data relating to interactions with newsletters processed for the purpose referred to in point d) are retained until consent to tracking is withdrawn or the recipient unsubscribes from the newsletter and, in any event, for a maximum period of 12 months from collection. If consent is withdrawn, individual-level data already collected are deleted or anonymised. The statistics referred to in point e) are retained exclusively in aggregated and anonymous form.

PROVISION OF DATA

The provision of data is mandatory for performance of the contractual relationship and for statutory purposes, and optional for marketing and newsletter interaction analysis purposes, which are subject to the data subject's consent. Failure to provide the data makes it impossible to fulfil the above purposes. Disabling only the tracking referred to in point d) does not in any way affect receipt of newsletters.

DATA SUBJECT RIGHTS, WITHDRAWAL OF CONSENT AND COMPLAINTS TO THE SUPERVISORY AUTHORITY

Data subjects have the right, at any time, to request access to their personal data, rectification, erasure or restriction of processing, to object to processing, to withdraw consent and, where applicable, to exercise the right to data portability. In all cases, data subjects have the right to withdraw any consent given to the processing of their data at any time, without affecting the lawfulness of processing based on consent before its withdrawal. In particular, data subjects may, at any time, use the link at the bottom of each newsletter to: (i) unsubscribe from the newsletter, withdrawing the consent given for the purposes referred to in points c)

and d); or (ii) access the preference centre and disable only the tracking referred to in point d), while continuing to receive newsletters. In the latter case, the Controllers will only have access to aggregated and anonymous statistics that cannot be linked to the data subject.

In the event of an alleged infringement, data subjects also have the right, where the relevant conditions are met, to lodge a complaint with a data protection supervisory authority in the EU Member State of their habitual residence, place of work or the place of the alleged infringement.

PROFILING AND AUTOMATED DECISION-MAKING

Processing does not involve automated decision-making (e.g. profiling).

CONTACT DETAILS AND REQUESTS

To obtain the full list of external parties to whom data are disclosed, request information on transfers of data to countries outside the EU and the transfer mechanisms and safeguards under Articles 44 et seq. of the GDPR, withdraw any consent given, or exercise your rights (access, rectification, erasure, restriction of processing, objection and portability), you may send a request to privacy@argea.com.

To withdraw consent to marketing or to tracking alone, you may use the link at the bottom of each newsletter, as explained in the section “Data subject rights, withdrawal of consent and complaints to the supervisory authority”.