

A. Who are we and why are we providing you with this document?

The Mondadori Group, a corporate group composed of the parent company Arnoldo Mondadori Editore S.p.A. and the companies controlled by the latter in accordance with article 2359 of the Italian Civil Code (hereinafter referred to as the “**Mondadori Group**”), has always considered the protection of the personal data of its customers and/or potential customers and users to be of primary importance, ensuring that the processing of personal data, carried out by any means, whether automated or manual, is carried out in full compliance with the protections and rights set forth by Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the “**Regulation**”) and other applicable legislation on personal data protection.

The term “personal data” refers to the definition provided in Article 4(1) of the Regulation, meaning *'any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person* (hereinafter “**Personal Data**”).

The Regulation provides that, before any processing of Personal Data – meaning, according to the relevant definition set out in Article 4(2) of the Regulation, *“any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction”* (hereinafter referred to as the “**Processing**”) – it is necessary that the person to whom such Personal Data refer is informed about the reasons why such data are required and how they will be processed. In this regard, the purpose of this document is to give you, in a simple and clear manner, all the useful and necessary information so that you can provide your Personal Data in a conscious and informed manner and, at any time, request and obtain clarifications and/or corrections.

This privacy policy, therefore, has been written on the basis of the principle of transparency and all the elements required by Article 13 of the Regulation and is divided into individual sections (hereinafter referred to as “**Sections**” and individually as “**Section**”) each of which deals with a specific topic in order to make your reading quicker, smoother and easier to understand (hereinafter referred to as the “**Privacy Policy**”).

After having read this Privacy Policy, during the registration and activation of the hosting service you required, you will also receive a specific consent form as provided for in Article 7 of the Regulation.

B. Who will process your Personal Data?

The company that will process your Personal Data for the main purpose referred to in Section D of this Privacy Policy and that, therefore, will act as controller according to the relevant definition provided in Article 4 point 7) of the Regulation, *“the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data”* is:

Mondadori Media S.p.A., with registered office in Via Gian Battista Vico 42, 20123 - Milan and administrative office in Via Mondadori 1, 20054 - Segrate (MI), enrolled in the Register of Companies of Milan, tax code and VAT no. 08009080964 (hereinafter the “**Controller**”).

The Controller, for some processing operations as identified in Section E below, will be joined by the following companies, which will act as joint controllers, to be understood as *“two or more companies that jointly determine the purposes and means of the processing”* as provided for in Article 26 of the Regulation:

- **Arnoldo Mondadori Editore S.p.A.**, with registered office in Via Gian Battista Vico 42, 20123 - Milan and administrative office in Via Mondadori 1, 20054 - Segrate (MI), enrolled in the Register of Companies of Milan, Tax code no. 07012130584 and VAT no. 08386600152
- **Mondadori Libri S.p.A.**, with registered office in Via Gian Battista Vico 42, 20123 - Milan (MI) and administrative office in Via Mondadori 1, 20054 - Segrate (MI), enrolled in the Register of Companies of Milan, Tax code and VAT no. 08856650968
- **Mondadori Scienza S.p.A.**, with registered office in Via Gian Battista Vico 42, 20123 - Milan and administrative office in Via Mondadori 1, 20054 - Segrate (MI), enrolled in the Register of Companies of Milan, tax code and VAT no. 09440000157
- **Mondadori Education S.p.A.** with registered office in Via Gian Battista Vico 42, 20123 - Milan, administrative office in Via Mondadori 1, 20054 - Segrate, enrolled in the Register of Companies of Milan, Tax code and VAT no. 03261490969
- **Rizzoli Education S.p.A.** with registered office in Via Gian Battista Vico 42, 20123 - Milan, administrative office in Via Mondadori 1, 20054 - Segrate, enrolled in the Register of Companies of Milan, Tax Code and VAT No. 05877160159
- **Giulio Einaudi Editore S.p.A.** with registered office and administrative headquarters at Via U. Biancamano 2, 10121 - Turin (TO), enrolled in the Register of Companies of Turin, Tax code no. 08367150151 and VAT no. 07022140011

- **Electa S.p.A.**, with registered office in Via Gian Battista Vico 42, 20123 - Milan, operating office and administrative headquarters in Via Mondadori 1, 20054 - Segrate (MI), enrolled in the Register of Companies of Milan, Tax code no. 01829090123 and VAT no. 09671010156
- **Mondadori Retail S.p.A.**, with registered office in Via Gian Battista Vico 42, 20123 - Milan and administrative office in Via Mondadori 1, 20054 - Segrate (MI), enrolled in the Register of Companies of Milan, tax code no. 00212560239 and VAT no. 11022370156
- **Press-Di Distribuzione Stampa e Multimedia S.r.l.** with registered office in Via Gian Battista Vico 42, 20123 - Milan and administrative office in Via Mondadori 1, 20054 - Segrate (MI), enrolled in the Register of Companies of Milan, Tax code and VAT no. 03864370964
- **Direct Channel S.p.A.** with registered office in Via Gian Battista Vico 42, 20123 - Milan and administrative office in Via Mondadori 1, 20054 - Segrate (MI), enrolled in the Register of Companies of Milan, Tax code and VAT no. 08696660151
- **Adkaora S.r.l.** with registered office in Via Gian Battista Vico 42, 20123 - Milan and administrative office in Via Mondadori 1, 20054 - Segrate (MI), enrolled in the Register of Companies of Milan, Tax Code and VAT No. 08105480969

(hereinafter jointly with the Controller, the “**Joint Controllers**”).

The Joint Controllers have entered into a joint controllership agreement, pursuant to Article 26 of the Regulation, by which they have undertaken to:

- jointly determine certain purposes and methods of Processing of your Personal Data;
- jointly determine, in a clear and transparent manner, the procedures for providing you with timely feedback should you wish to exercise your rights, as provided for in Articles 15, 16, 17, 18 and 21 of the Regulation, as well as in cases of portability of Personal Data as provided for in Article 20 of the Regulation, as further described in Section I of this Privacy Policy;
- jointly define this Privacy Policy in the parts of mutual interest indicating all the information required by the Regulation.

C. Who can you contact for any information or request?

The Controller and/or the Joint Controllers may be contacted via the following channels:

- by writing to the Mondadori Group Privacy Office at the parent company Arnoldo

Mondadori Editore S.p.A., Via Mondadori 1, 20054 - Segrate (Milan);

- by sending an e-mail to the e-mail address privacy@mondadori.it to the kind attention of the Mondadori Group Privacy Office;
- by calling +39 02 75421 and asking for the Mondadori Group Privacy Office.

Moreover, in order to facilitate the relationship between you, as the data subject, meaning the “*identified or identifiable natural person*” to whom the Personal Data refer pursuant to article 4, point 1) of the Regulation (hereinafter the “**Data Subject**”) and the Controller and/or the Joint Controllers, the Regulation has provided, in certain specific cases, for the appointment of a control and support figure who, among other tasks, also acts as a point of contact with the Data Subject.

The Mondadori Group has implemented this function of “*Data Protection Officer*” (hereinafter referred to as the “**DPO**”).

The DPO, pursuant to and for the purposes of Article 39 of the Regulation, is called upon to perform, *inter alia*, the following activities:

- informing and advising the Controller, the Joint Controllers, the data processor as well as the employees carrying out the Processing with regard to the obligations arising from the Regulation as well as from other provisions of the European Union or of the Member States relating to the protection of Personal Data;
- monitor and supervise compliance with the Regulation, the applicable regulations on the protection of Personal Data, and the policies and procedures adopted by the Controller and the Joint Controllers;
- provide feedback support to the Data Subject;
- cooperate with the Garante per la Protezione dei Dati Personali or other competent supervisory authority.

As provided for in article 38 of the Regulation, you may feel free to contact the DPO for all matters relating to the Processing of your Personal Data and/or should you wish to exercise your rights as provided for in Section I of this Privacy Policy, by sending a written communication to the e-mail address dpo@mondadori.it and/or by writing to the Data Protection Officer of the Mondadori Group at Arnoldo Mondadori Editore S.p.A., via Mondadori 1, 20054 - Segrate (MI).

You may consult the “Privacy” section of the Mondadori Group’s web sites at any time, where you will find all the information regarding the use and processing of your Personal Data, the detailed references of each company of the Mondadori Group, and updated information on the contacts and communication

channels made available to all interested parties by the Controller.

D. For what main purpose will your Personal Data be processed?

Without prejudice to what has been clarified in the Privacy Policy you have already received relating to browsing the website available at the following link <https://digital.mondadori.it/privacy/informativasiti/mondadorieditore.html>, this Privacy Policy refers to the Processing of Personal Data carried out by the Controller in order to offer and provide the hosting and other related services requested by you.

In particular, the Controller will process your Personal Data for the following purposes:

1. Completion and execution of the contractual relationship.

Upon your request, the Controller will process your Personal Data for the purpose of evaluating your request to use the hosting services offered by the Controller and, where applicable, executing the relevant contractual relationship pursuant to Article 6(1)(b) of the Regulation.

The Processing will be carried out through the collection and processing of the Personal Data communicated by you during the request and registration process, as well as other technical information associated with you, such as your IP address, the approximate origin of the connection, the timestamp of the request (i.e., date and time), the browser identifier, and other related technical metadata. For the sake of transparency, we inform you that the latter technical information, together with your personal identification (meaning, your first and last name or company name and VAT number) and your e-mail address, will be processed by the Controller through an automated decision-making process insofar as it is necessary for a preliminary assessment of the trustworthiness and lawfulness of your request to use the hosting service offered by the Controller. This decision-making process is carried out by means of a special algorithm – developed by the Controller in compliance with the principles of privacy by design and by default and including appropriate measures to protect the rights, freedoms, and legitimate interests of Data Subjects – which analyses the above information and automatically identifies potentially unlawful, fraudulent and/or fictitious requests (“**Algorithm**”). This decision-making process is strictly necessary for the conclusion of the contract between you and the Controller because the number of requests received by the Controller would make it impossible to handle each request manually (for instance, because they could be made in a massive way by an automated BOT).

You will always have the opportunity to obtain the human intervention of the Controller's staff, to express your opinion about the possible refusal and/or, in any case, to contest the decision taken by the Controller. To exercise these rights, you will be able to interact directly

with the communication of refusal that you may have received and/or contact the Controller at the contacts indicated in this Privacy Policy.

2. Maintenance and improvement of the Algorithm.

As stated in paragraph 1. above, the Controller uses the Algorithm to carry out a preliminary assessment of requests for activation of the hosting service. In this regard, it is in the Controller's interest to ensure that the Algorithm always provides precise and accurate results, effectively and efficiently detecting any unlawful, fraudulent and/or fictitious activation requests. For this reason, subject to your right to object, the Personal Data processed by the Algorithm for the purpose under 1) will be retained for an additional period of 15 days from the date of the service activation request to be used for improving the effectiveness and reliability of the Algorithm, and to minimize the rate of any errors. We consider it important to point out that (a) all this will be done by applying specific minimization and security measures, (b) only where you have not exercised your right to object, and (c) it is ultimately also done for the benefit of the Data Subjects themselves because it serves to protect your expectation to obtain a reliable and correct evaluation. These interests have been specifically assessed by means of a balancing assessment pursuant to Article 6.1(f) of the Regulation, from which it emerged that the interest of the Controller in the maintenance and improvement of the Algorithm is legitimate and would seem to prevail over the generic and countervailing interest in the confidentiality of the Data Subjects. In any case, we remind you that you may object to the Processing at any time by contacting the Controller at the contact details provided in this Privacy Policy.

3. Compliance with legal or regulatory obligations.

As the case may be, the Controller may process your Personal Data in order to comply with legal and/or regulatory obligations applicable to it, as well as to respond to requests from competent authorities. In this case, the Processing of your Personal Data will be based on the fulfilment of legal obligations to which the Controller is subject pursuant to Article 6(1)(c) of the Regulation.

4. Merger and acquisition operations and/or corporate reorganization.

To the extent applicable, the Controller may also disclose or process your Personal Data in the context of M&A operations, transfer of contract, business or business unit, corporate reorganization and restructuring in order to conclude and manage such operations or to fulfil contractual obligations arising therefrom. In this case, the Processing of your Personal Data will be legally based on the legitimate interest of the Controller to perform such operations pursuant to Article 6(1)(f) of the Regulation. You will always have the right to object for reasons

based on your particular situation and, as the case may be, you will be provided with further information with more details about the specific processing carried out in the context of the corporate transaction.

- 5. Defense in court and protection of own interests.** The Controller may process your Personal Data to assess, exercise and/or defend its rights in judicial and/or litigation proceedings. Such Processing will be legally based on the legitimate interest of the Controller to protect its rights within the meaning of Article 6(1)(f) of the Regulation. You will always be granted the right to object for reasons based on your particular situation and, as the case may be, you will be provided with further information with more details about the specific processing carried out.

In order to allow the Controller to carry out the Processing activities for the purposes set out in points 1) and 3) above, it will be necessary for you to provide the Personal Data marked with the symbol *. In the absence of even one of such information, it will not be possible to proceed with the Processing of your Personal Data and, consequently, it will not be possible to complete your request for activation of the hosting service and, if applicable, of the other services contextually requested and, as the case may be, to fulfil the legal obligations applicable to the Controller. For the remaining purposes referred to in numbers 2), 4) and 5), the provision of data is optional, but in any case, necessary for the performance of each Processing; depending on the case, therefore, it may not be possible to perform the Processing and/or continue with the performance of the contract entered into by you.

The Personal Data that will be requested from you for the pursuit of the above purposes will be the data indicated on the registration forms, meaning, depending on the services requested from the Controller: first name, last name and/or company name, username, year of birth, address of domicile/residence, e-mail address, telephone numbers of landlines and/or mobile phones, tax code and/or VAT number, IP address, approximate location on at least a regional basis of the Internet connection, frequency of connection attempts and other associated technical information. In addition, if you also activate services that involve the money transfers to you (e.g., advertising revenue), the Controller will also process your place and date of birth, your IBAN and/or PayPal address and other information strictly necessary to process the payment.

E. Further purposes

The Controller, together with the Joint Controllers, may request, in addition to the above Personal Data, further Personal Data such as, by way of example but not limited to, data relating to tastes, preferences, habits, needs and consumer choices. The provision of such Personal Data is optional and failure to provide it will not affect your registration with the Websites or your ability to send requests or use the services offered by the Websites.

Subject to your express, free and unambiguous consent pursuant to Article 6(1)(a) of the Regulation or, as specified below, on the basis of legitimate interest, the Joint Controllers may process your Personal Data for the following purposes:

- **Direct marketing purposes:** by this term is meant the intention of the Joint Controllers to carry out promotional and/or marketing activities towards you. This category includes all activities carried out to promote products, services, sold and/or provided by the Joint Controllers on the basis of their legitimate interest in pursuing their corporate purpose.
- **Indirect marketing purposes:** by this term is meant the intention of the Controllers to carry out promotional and/or marketing activities for you on behalf of third parties. This category includes all the activities carried out to promote products, services, sold and/or provided by third parties with whom the Joint Controllers have a legal relationship without any data communication in this case.
- **Profiling Purposes:** this term refers to the Joints Controllers' intention to profile you, meaning to evaluate your tastes, preferences and consumption habits, also in connection with market surveys and statistical analyses. This includes any form of automated processing of Personal Data in order to evaluate certain personal aspects such as, but not limited to, your professional performance, economic situation, personal preferences, interests, reliability, behaviour, location or movements.

The Processing of your Personal Data for the purposes referred to in points (ii) and (iii) cannot be carried out without your consent, which must necessarily comply with the conditions set out in Article 7 of the Regulation, thus determining the lawfulness of the Processing of your Personal Data.

With regard to the direct marketing purpose referred to in point (i) above, please note that, by virtue of Article 6(1)(f) of the Regulation, the Joint Controllers may carry out this activity on the basis of their legitimate interest, irrespective of your consent and in any case until you object to such Processing, as further explained in Recital 47 of the Regulation, which states that "*the processing of personal data for direct marketing purposes may be regarded as carried out for a legitimate interest*". This will also be possible following the assessments made by the Joint Controllers as to whether your interests, fundamental rights and freedoms requiring the protection of your Personal Data override their legitimate interest in sending you direct marketing communications.

The contact methods used for direct and indirect marketing and profiling activities, as set out in points (i), (ii) and (iii) above, may be either automated (email) or traditional (where permitted, telephone calls with operator, postal mailings). In any case, and as further specified in Sections H and I below, you may object to the Processing and/or revoke your consent, even partially, for instance by consenting only to traditional contact methods.

With regard to the contact methods involving the use of your telephone contacts, we remind you that marketing activities by the Joint Controllers will be carried out

subject to verification of your possible registration in the Register of Oppositions as established pursuant to and for the purposes of Presidential Decree no. 178 of 7 September 2010, as amended from time to time.

F. To which entities may your Personal Data be disclosed?

Your Personal Data may be disclosed to specific entities that are considered recipients of such Personal Data. In fact, Article 4(9) of the Regulation defines a recipient of Personal Data as “a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not” (hereinafter referred to as the “**Recipients**”).

In this perspective, in order to properly carry out all the Processing activities necessary to pursue the purposes set out in this Privacy Policy, the following Recipients may be in a position to process your Personal Data:

- third parties who carry out part of the Processing activities and/or activities connected and instrumental thereto on behalf of the Controller or of the Joint Controllers. Such entities have been appointed as Controllers, whereby this expression is to be understood, pursuant to Article 4(8) of the Regulation, as “a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller” (hereinafter the “**Processor**”);
- individuals, employees and/or contractors of the Controller or of the Joint Controllers, who have been entrusted with specific and/or multiple Processing Activities of your Personal Data. Such individuals have been given specific instructions on the security and proper use of Personal Data and are defined, pursuant to Article 4(10) of the Regulation, as “persons who, under the direct authority of the controller or processor, are authorised to process personal data” (hereinafter the “**Authorised Persons**”);
- third parties who carry out processing activities and/or activities connected and instrumental to the same as autonomous Controllers, including but not limited to consulting companies, freelance professionals, credit institutions, insurance companies, third-party companies and/or companies that are part of the Mondadori Group;
- where required by law or to prevent or suppress the commission of a criminal offence your Personal Data may be disclosed to public bodies or judicial authorities without them being defined as Data Subjects. Indeed, according to Article 4(9) of the Regulation, “public authorities which may receive personal data in the

framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients”.

G. How long will your Personal Data be processed?

One of the principles applicable to the Processing of your Personal Data relates to the limitation of the retention period, which is governed by Article 5(1)(e) of the Regulation, which provides that “personal data are kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject”.

In light of this principle, your Personal Data will be processed by the Controller only to the extent necessary for the fulfilment of the purpose set out in Section D of this Privacy Policy. Please note that the Personal Data processed for the purpose D.2 - Maintenance and improvement of the Algorithm will be processed for a maximum period of 15 days from the date you requested the activation of the hosting service. In particular, your Personal Data will be kept for a period of time equal to the minimum necessary, as indicated by Recital 39 of the Regulation, that is, up to ten years from the termination of the existing contractual relationship between you and the Controller, without prejudice to an additional retention period that may be imposed or permitted by law as also provided for by Recital 65 of the Regulation.

With respect to the processing operations carried out for the purposes set out in Section E of this Privacy Policy, the Joint Controllers may lawfully process your Personal Data until you communicate, in one of the ways set out in this Privacy Policy, your wish to withdraw your consent for any or all of the purposes for which you have been asked to provide your Personal Data and/or to object to the Processing. If you withdraw your consent or exercise your right to object, this will effectively oblige the Joint Controllers to cease the Processing of your Personal Data for such purposes.

H. Is it possible to withdraw the consent given and how?

As provided by the Regulation, where you have given your consent to the Processing of your Personal Data for one or more of the purposes for which you have been requested, you may, at any time, withdraw your consent in whole and/or in part without prejudice to the lawfulness of the Processing based on the consent given before the withdrawal.

The modalities for withdrawing consent are very simple and intuitive, you just need to contact the Controller and/or the Joint Controllers and/or the DPO using the contact channels provided in section C of this Privacy Policy.

In addition to the above and for the sake of simplicity, should you find yourself in the condition of receiving advertising e-mail messages from the Joint Controllers that are no longer of interest to you, simply click on the *unsubscribe* button at the bottom of those messages to stop receiving any further communication, even through other contact channels for which your consent had been obtained (SMS, MMS, paper mail, fax, phone calls).

I. What are your rights?

As provided for in the Regulation, you may at any time exercise the following rights vis-à-vis the Controller and/or the Joint Controllers:

- Right of access: you have the right, pursuant to Article 15(1) of the Regulation, to obtain from the Controller confirmation as to whether or not your Personal Data is being processed and, if so, to obtain access to such Personal Data and to the following information (a) the purposes of the Processing; (b) the categories of Personal Data concerned; (c) the Recipients or categories of Recipients to whom your Personal Data has been or will be disclosed, in particular if Recipients from third countries or international organisations; d) where possible, the expected period of retention of Personal Data or, if this is not possible, the criteria used to determine this period; e) the existence of the Data Subject's right to request from the Controller the rectification or erasure of Personal Data or the restriction of the Processing of Personal Data concerning him/her or to object to the Processing of Personal Data f) the right to lodge a complaint with a supervisory authority; g) if the Personal Data are not collected from the Data Subject, all available information on their origin; h) the existence of an automated decision-making process, including profiling as referred to in Article 22(1) and (4) of the Regulation and, at least in such cases, meaningful information on the logic used, as well as the importance and the foreseen consequences of such Processing for the Data Subject. All this information can be found in this Privacy Policy which will always be available to you in the Privacy section of each of the Websites.
- Right of rectification: you may obtain, pursuant to Article 16 of the Regulation, the rectification of your Personal Data that is inaccurate. Considering the purposes of the Processing, you may also obtain the integration of your Personal Data that are incomplete, including by providing a supplementary declaration.
- Right to erasure: you may obtain, pursuant to Article 17(1) of the Regulation, the erasure of your Personal Data without undue delay and the Controller shall be obliged to erase your Personal Data if any of the following reasons apply (a) your Personal Data is no longer necessary in relation to the purposes for which it was collected or otherwise processed; (b) you have withdrawn the consent on which the Processing of your Personal Data is based and there is no other legal basis for its Processing; c) you have objected to the Processing in accordance with Article 21(1) or (2) of the Regulation and there is no longer any overriding legitimate ground for the Processing of your Personal Data; d) your Personal Data has been processed unlawfully; e) it is necessary to delete your Personal Data in order to comply with a legal obligation under EU or national law. In some cases, as provided for in Article 17(3) of the Regulation, the Controller is entitled not to erase your Personal Data if the Processing of your Personal Data is necessary, for example, for the exercise of the right to freedom of expression and information, to comply with a legal obligation, for reasons of public interest, for archiving in the public interest, for scientific or historical research or statistical purposes, for the establishment, exercise or defence of legal claims.
- Right to restriction of processing: you may obtain the restriction of the Processing, pursuant to Article 18 of the Regulation, in the event that one of the following cases occurs (a) you have objected to the accuracy of your Personal Data (the restriction will last for the period necessary for the Controller to verify the accuracy of such Personal Data); (b) the Processing is unlawful but you have objected to the deletion of your Personal Data, requesting instead that its use be restricted c) although the Controller no longer needs your Personal Data for the purposes of the Processing, your Personal Data is needed for the establishment, exercise or defence of legal claims; d) you have objected to the Processing pursuant to Article 21(1) of the Regulation and are awaiting verification as to whether the Controller's legitimate reasons prevail over yours. If the Processing is restricted, your Personal Data will be processed, except for storage, only with your consent or for the establishment, exercise or defence of legal claims or to protect the rights of another natural or legal person or for reasons of substantial public interest. We will, in any event, inform you before such restriction is lifted.
- Right to data portability: you may, at any time, request and receive, pursuant to Article 20(1) of the Regulation, all of your Personal Data processed by the Controller and/or the Joint Controllers in a structured, commonly used and readable format or request its transmission to another Controller without hindrance. In this case, it will be your responsibility to provide us with the exact details of the new controller to which you intend to transfer your Personal Data by providing us with written authorisation.

- Right to object: pursuant to Article 21 of the Regulation you may object, at any time, to the Processing of your Personal Data a) if it is processed for direct marketing purposes, including profiling insofar as it is related to such direct marketing, or b) for reasons related to your particular situation, if your Personal Data is processed on the basis of the legitimate interest of the Controller or a third party, unless there are compelling legitimate grounds for the Processing which override your interests, rights and freedoms or the Processing is necessary for the establishment, exercise or defence of legal claims.
- Right not to be subject to automated decision-making relating to natural persons: in accordance with Article 22 of the Regulation and given the need to use the Algorithm for activities preparatory to the conclusion of the contract with the Controller in relation to the hosting service, you have the right to (i) obtain human intervention by the Controller in order to obtain a review of the results of the decision-making process, (ii) express your opinion, and/or (iii) contest the decision made.

To exercise all your rights as identified above, simply contact the Controller and/or the Joint Controllers in the manner set out in Section C of this Privacy Policy.

Please note that you may also contact the DPO of the Mondadori Group at any time in the manner set out in Section C of this Privacy Policy.

In addition, you have the right to lodge a complaint with the supervisory authority: without prejudice to your right to appeal to any other administrative or judicial body, if you consider that the Processing of your Personal Data carried out by the Controller and/or the Joint Controllers is in breach of the Regulation and/or the applicable legislation, you may lodge a complaint with the Italian Data Protection Authority or any other competent supervisory authority.

Please note that you may also contact the DPO of the Mondadori Group at any time in the manner set out in Section C of this Privacy Policy.

J. Where will your Personal Data be processed?

Your Personal Data will be processed by the Controller and/or the Joint Controllers within the territory of the European Union.

If for technical and/or operational reasons it is necessary to use entities located outside the European Union, we hereby inform you that, where such entities process Personal Data on behalf of the Controller and/or the Joint Controllers, they will be appointed as Processors pursuant to article 28 of the Regulation and the transfer of your Personal Data to such entities, limited to the performance of specific Processing activities, will be governed by the provisions of chapter V of the Regulation. Therefore, all necessary

precautions will be taken in order to ensure the most complete protection of your Personal Data by basing such transfer: (a) on adequacy decisions of the receiving third countries issued by the European Commission; (b) on standard contractual clauses drafted by the European Commission; (c) on the adoption of *corporate binding rules*.

In any event, you may request further details from the Controller and/or the Joint Controllers if your Personal Data has been processed outside the European Union and ask for evidence of the specific safeguards adopted.