

# PRIVACY POLICY

Informative document pursuant to and for the purposes of Article 13 of Regulation (EU) 2016/679 (GDPR)

## 1. INTRODUCTION

### Why this information?

Pursuant to Regulation (EU) 2016/679 (hereinafter "GDPR"), this page describes the methods of processing personal data. This notice is provided in accordance with article 13 of the GDPR. It does not apply to other third-party websites that may be accessible through links on this website, for which no responsibility is assumed.

### Information on the processing of personal data carried out through Social Media platforms

Regarding the processing of personal data by the operators of the Social Media platforms used by the Data Controller, please refer to the privacy policies provided by those platforms. The Data Controller processes personal data provided by users through the dedicated Social Media pages to manage interactions with users (comments, public posts, etc.), in compliance with applicable regulations.

### Specific notices

Specific privacy notices may be available on the pages of the Site in relation to particular services or data processing activities.





## 2. WHO IS THE DATA CONTROLLER?

The Data Controller is **Molteni Group S.p.a.**, with its registered office at Via Rossini 50 - Giussano (MB), Italy represented by the person vested with the necessary powers. The contact details of the Data Controller are as follows: telefono: +39 0362 3591, e-mail: [privacy@moltenigroup.com](mailto:privacy@moltenigroup.com).

## 3. CATEGORIES OF PERSONAL DATA PROCESSED

- **Personal data:** any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is one who can be identified, directly or indirectly, by reference in particular to an identifier such as a name, an identification number, location data, an online identifier, or to one or more features of his or her physical, physiological, genetic, mental, economic, cultural or social identity (C26, C27, C30 GDPR).
- **Contractor/user data.**
- **Browsing data:** Browsing data: the computer systems and software procedures used to operate this site acquire, in the course of their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols. This category of data includes IP addresses or domain names of the computers and terminals used by users, the addresses in URI/URL (Uniform Resource Identifier/Locator) notation of the resources requested, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment.
- **Data communicated voluntarily:** the optional, explicit and voluntary sending of messages to the contact addresses indicated on this site and/or the filling in of data collection forms involves the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data entered.

## 4. PURPOSE OF PROCESSING, LEGAL BASIS, PERIOD OF DATA RETENTION, NATURE OF PROCESSING

 PURPOSE OF PROCESSING	 LEGAL BASIS	 PERIOD OF DATA RETENTION	 NATURE OF PROCESSING
<b>A. Navigation on this website.</b> The data necessary for the use of web services is also processed for the purpose of: <ul style="list-style-type: none"><li>•obtain statistical information on the use of the services (most visited pages, number of visitors by time slot or daily, geographical areas of origin, etc.);</li><li>•check the proper functioning of the services offered.</li></ul> The data will be used to ascertain responsibility in case of hypothetical computer crimes against the site.	Processing is necessary for the pursuit of the legitimate interest of the data controller or a third party, provided that the interests or fundamental rights and freedoms of the data subject requiring the protection of personal data do not prevail, taking into account the reasonable expectations of the data subject and the activities strictly necessary for the	The storage of browsing data will be for as long as the duration of the browsing session. In any case, the same will persist for maximum two weeks (except for possible needs of investigation of crimes by the judicial authority).	The provision of data is necessary for browsing the website.

	<p>operation of the site and navigation itself.</p> <p>Art. 6(1)(f) and Recital 47 of the GDPR.</p> <p>Data subjects are guaranteed the opportunity to obtain, upon request, information on the balancing test carried out.</p>		
<p><b>B. Use of cookies and similar technologies.</b> Please refer to the cookie policy in the website footer.</p>	<p>For non-essential cookies and similar technologies, the processing is based on the data subject's consent. Consent is given through the website's cookie banner and cookie policy.</p> <p>Art. 6(1)(a) and Recitals 42 and 43 of the GDPR.</p>	<p>Please refer to the cookie policy available in the footer of the website.</p>	<p>Please refer to the cookie policy available in the footer of the website.</p>
<p><b>C. Contacts</b>, for submitting contact or information requests (including inquiries regarding bookings and guided tours at the Molteni Museum) and for downloading our catalogue.</p>	<p>The processing is necessary for the performance of a contract to which the data subject is party or for the implementation of pre-contractual measures taken at the data subject's request.</p> <p>Art. 6(1)(b) and Recital 44 of the GDPR.</p>	<p>Maximum 12 months.</p>	<p>The provision of data is necessary. Failure to provide the required information will result in the inability to be contacted and to receive information.</p>
<p><b>D. In-Store Experience</b>, for the registration via the contact form to download our Catalogue and to be contacted by our staff.</p>	<p>The processing is necessary for the performance of a contract to which the data subject is party or for the implementation of pre-contractual measures taken at the data subject's request.</p> <p>Art. 6(1)(b) and Recital 44 of the GDPR.</p>	<p>Maximum 12 months.</p>	<p>The provision of data is necessary. Failure to provide the required information will result in the inability to download our Catalogue or to be contacted by our staff.</p>
<p><b>E. Direct Marketing</b>, for sending advertising or direct sales material, or for carrying out market research, commercial and promotional communications, and newsletters, using automated means (email, SMS) and traditional methods (telephone and postal mail). Communications may include promotional content and/or logos of third-party partners and group companies. For the complete list of group companies and partners, data subjects may contact <a href="mailto:privacy@moltenigroup.com">privacy@moltenigroup.com</a>. The Data Controller uses reporting systems to compare and, where necessary, improve the results of automated communications. Through these reports, the Data Controller may obtain, for example: the number of readers, openings, unique and total clicks; the devices and operating systems used to view the communication; details of individual user activity;</p>	<p>The processing is based on the data subject's consent for the processing of personal data.</p> <p>Art. 6(1)(a) and Recitals 42 and 43 of the GDPR.</p>	<p>Until the withdrawal of consent (opt-out).</p>	<p>The provision of data is optional. Failure to provide the required information will result in the inability to receive direct marketing communications.</p>

and details of emails sent, delivered, undelivered, or forwarded. All such data is used for the purpose of analyzing and potentially enhancing the effectiveness of communications.			
<b>F. Non-Automated Profiling:</b> personal data will be entered into the company CRM/platforms for the purpose of conducting analyses, evaluations, and for grouping data subjects into homogeneous categories based on specific business-related characteristics, to improve service management and to send targeted promotional communications.	The processing is based on the data subject's consent for the processing of personal data. Art. 6(1)(a) and Recitals 42 and 43 of the GDPR.	Until the withdrawal of consent (opt-out) and, in any case, for no longer than 36 months from the date of collection.	The provision of data is optional. Failure to provide the required information will make it impossible to perform analyses or send targeted communications.
<b>G. Disclosure/Transfer of Data</b> to other companies within the Molteni Group (parent and subsidiaries of Molteni Group S.p.A.) for purposes of direct marketing. For the complete list of group companies and partners, data subjects may contact <a href="mailto:privacy@moltenigroup.com">privacy@moltenigroup.com</a> .	The processing is based on the data subject's consent for the processing of personal data. Art. 6(1)(a) and Recitals 42 and 43 of the GDPR.	Until the withdrawal of consent. Please also refer to the privacy notice concerning the processing of personal data by third-party independent data controllers.	The provision of data is optional. Failure to provide the required information will result in the inability to disclose/transfer the data to third parties for their purposes.
<b>H. Management of your requests and those of other data subjects,</b> pursuant to articles 15 et seq. of the GDPR (data subject rights).	The processing is necessary for compliance with a legal obligation to which the Data Controller is subject. Art. 6(1)(c) and Recital 45 of the GDPR.	5 years from the closure of the request, unless legal disputes arise.	The provision of personal data is mandatory, as it is indispensable for the Data Controller to comply with legal obligations.
<b>I. Work with Us Area</b> (if applicable) for submitting applications for personnel selection, conducting recruitment and selection activities with a view to the possible establishment of an employment relationship, including for positions different from those for which the candidate has applied spontaneously; retention of personal data for future selection processes; management of applications in response to job offers published on our website; interviews and potential video interviews (including processing of image and audio data).	The processing is necessary for the performance of a contract to which the data subject is party or for the implementation of pre-contractual measures taken at the data subject's request. Art. 6(1)(b) and Recital 44 of the GDPR.	Maximum 24 months.  As a general rule, the data collected during the recruitment process will be deleted as soon as it becomes clear that no employment offer will be made or that the offer will not be accepted by the candidate.	The provision of data is necessary. Failure to provide the required information will result in the inability to submit the application.
<b>J. Customer Area</b> (if applicable), to access the reserved area with user credentials.	The processing is necessary for the performance of a contract to which the data subject is party or for the implementation of pre-contractual measures taken at the data subject's request. Art. 6(1)(b) and Recital 44 of the GDPR.	Until the termination of the contract and for the technical time necessary to disable the credentials.	The provision of data is necessary. Failure to provide the required information will result in the inability to submit the application.
<b>K. Dispute management,</b> for the handling of information useful for the proper management of disputes and situations that may arise during the course of the relationship, including any out-of-court and/or judicial	The processing is necessary for the purposes of the legitimate interests pursued by the data controller or by third parties, provided that such interests are not	10 years, unless objected to and except for the time necessary for legal defense.	The provision of data is necessary. Failure to provide such data will prevent the achievement of the Data Controller's

phases, as well as defense in the event of legal proceedings.	overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data. Art. 6(1)(f) and Recitals C47-C50 of the GDPR.		legitimate interest as indicated in the purposes of this section. Any objection must be balanced against the Data Controller's legitimate interest as specified in the purposes of this section.
<b>L. Webinar Area</b> (if applicable) for activities related to participation in webinars, in order to verify attendance. The Data Controller receives a report that provides information on the total number of participants in the event and their level of engagement during the webinar. The webinar will be recorded.	The processing is necessary for the performance of a service/contract to which the data subject is a party, or for the implementation of pre-contractual measures taken at the data subject's request. Art. 6(1)(b) and Recital 44 of the GDPR.	Maximum 12 months.	The provision of data is necessary. Failure to provide the required data will result in the inability to participate in the webinar.

## 5. WHO WILL PERSONAL DATA BE DISCLOSED TO? DATA RECIPIENTS

Personal data will be disclosed to entities that will process the data as independent Data Controllers, or as Data Processors (art. 28 GDPR) and processed by natural persons (art. 29 GDPR) acting under the authority of the Controller and Processors based on specific instructions regarding the purposes and methods of processing. Data will be disclosed to recipients belonging to the following categories:

- Companies within the Molteni Group;
- Entities providing services for the management of the IT system and communication networks, including email, web platforms, cloud services, and software;
- Entities with whom the Controller has entered into economic agreements and, where required, with prior consent;
- For direct marketing, with prior consent, to entities managing direct marketing activities;
- For third-party marketing, with prior consent, to the categories of third parties listed above in the specific purpose (list available on request);
- For the "Work With Us" area, to entities managing recruitment activities; and
- Competent authorities for compliance with legal obligations and/or requests from public bodies.

The list of Data Processors pursuant to Art. 28 is available upon request at the contacts indicated in paragraph 1 of this Privacy Policy.

## 6. WILL DATA BE TRANSFERRED TO NON-EEA COUNTRIES?

The personal data provided may be transferred outside the European Economic Area (EEA). In cases where a transfer outside the EEA takes place, personal data will be transferred based on the safeguards provided for in Articles 44 and following the GDPR.

For information regarding the safeguards related to the transfer of data outside the EEA, data subjects can write to [privacy@moltenigroup.com](mailto:privacy@moltenigroup.com).

## 7. IS THERE AN AUTOMATED PROCESS?

Personal data will be processed manually, electronically, and through automated means. It should be noted that, with regard to profiling activities, these will be carried out with the intervention of an operator who, with the data subject's prior consent, will process the data for internal analysis and to group individuals based on specific characteristics (e.g., profession and origin), in order to better manage services and send targeted promotional communications.

## 8. COOKIES AND OTHER TRACKING SYSTEMS. WHAT ARE THEY? WHAT ARE THEY USED FOR?

For information on cookies and other tracking systems, please refer to the cookie policy available in the website footer and at the following [link](#).

## **9. WHAT ARE YOUR RIGHTS? HOW CAN YOU EXERCISE THEM?**

Data subjects may exercise their rights as set out in Articles 15 et seq. of the GDPR by contacting the Data Controller at the e-mail address: [privacy@moltenigroup.com](mailto:privacy@moltenigroup.com). The Data Controller ensures that data subjects can, at any time, request access to their personal data (Art. 15), rectification (Art. 16), deletion (Art. 17), and restriction of processing (Art. 18). The Data Controller communicates (Art. 19) to each recipient to whom the personal data have been disclosed any corrections, deletions, or restrictions of processing carried out, and informs the data subjects upon request of such recipients. The Data Controller guarantees the right to data portability (Art. 20) and, in response to requests under Art. 20, will provide the data subjects with their data in a structured, commonly used, and machine-readable format.

Data subjects also have the right to object (Art. 21), at any time, to the processing of data based on legitimate interest by writing to the contacts above with the subject "objection." They also have the right to object, at any time, to the processing of their data (including automated processing, e.g., profiling), as well as to withdraw consent previously given, without affecting the lawfulness of processing based on consent before its withdrawal. To withdraw consent for non-automated profiling, it is sufficient to send an email at any time to [privacy@moltenigroup.com](mailto:privacy@moltenigroup.com) with the subject "no profiling." To stop receiving marketing communications, simply send an email to [privacy@moltenigroup.com](mailto:privacy@moltenigroup.com) with the subject "marketing cancellation" or use our automated cancellation systems provided for emails only. If data subjects believe that the processing of personal data by the Data Controller violates Regulation (EU) 2016/679, they are free to lodge a complaint with the [national supervisory authority](#), particularly in the Member State where they usually reside or work, or where the alleged violation occurred (Garante Privacy <https://www.garanteprivacy.it/>), or to take appropriate legal action.

## **10. CHANGES TO THE PRIVACY POLICY**

The Data Controller reserves the right to modify, add, or remove any part of this Privacy Policy. To facilitate verification of any changes, the Privacy Policy will indicate the date of the latest update.

Last updated: November 10th 2025