

PRIVACY POLICY

INFORMATION ON THE PROCESSING OF PERSONAL DATA (PRIVACY) According to EU Regulation 2016/679

With reference to the provisions of EU Regulation 2016/679, in particular regarding articles. 12 and 13, We inform you that your personal data will be processed in accordance with current legislation.

AIM TECH Srl based in Cernusco sul Naviglio (MI), Via Cavalcanti n. 8, Italy, is constantly committed to adopting technical and organizational solutions aimed at ensuring high standards of lawfulness, security and protection in the processing of personal data: the requirements of the General Data Protection Regulation of the European Union are implemented (hereinafter in the text "GDPR" acronym for General Data Protection Regulation) and other legal provisions, including, in particular, those of the Code regarding the protection of personal data Legislative Decree 30 June 2003, n. 196 (hereinafter the "Privacy Code" or "Code") and the subsequent Legislative Decree 10 August 2018, n. 101.

- **1.** AIM TECH S.r.l. (hereinafter in the text "AIM" or "we"), is the owner and the Data Controller of the processing of your personal data in accordance with the GDPR and the Code.
- 2. Personal data means any type of information relating to an identified or identifiable natural person (hereinafter "Data"). Data provided by you: any data you have provided to request the purchase and sale of a good and / or the provision of a service; the Data could be, for example: your name and surname, your contact details (including address, telephone number and e-mail address), profession, date and place of birth, tax code. Providing such information, if required by the contract or essential to the execution of the information, is a necessary requirement for the conclusion of the Contract; failure to communicate such data may make it impossible to conclude the Contract and / or provide the related services and products by AIM. The aforementioned data may have already been provided by you. The navigation data that the computer systems and software procedures used to operate the domain acquire, in the course of ordinary operation, such as IP addresses or domain names of the computers used by users who connect to the internet domain that can be used for the sole purpose of obtaining anonymous statistical information and to check the correct functioning of the domain and any abuses or anomalies.

AIM does not acquire and does not process categories of personal data, such as information revealing your racial origin, your political opinions, your religious or philosophical beliefs. AIM may process data from services and software downloaded by the user including surveys and positions if expressly consented by the interested party and / or if necessary for the supply of the goods and / or the services expressly requested by the data subject.

- **3**. Personal data means any type of information relating to an identified or identifiable natural person (hereinafter "Data"). We will only process your Data where permitted by applicable law provisions. Specifically, we will process your Data on the basis of articles. 6 and 9 GDPR and on the basis of consent pursuant to art. 7 GDPR, as well as in compliance with the corresponding rules of the Code:
- Consent art. 6 (1) Paragraph 1 (a), Art. 7 GDPR): We will treat certain Data exclusively in the presence of your preliminary, free and express consent. You have the right to withdraw the consent given at any time with effect for the future.
- Execution of a contract: in order to finalize and execute the requested contract, it is necessary to have access to and process certain Data.
- Compliance with a legal obligation art. 6 (1) paragraph 1 (c) GDPR): in order to ensure compliance with these requirements, we must process certain data.
- 4. Your Data will be processed by us only and exclusively for the purposes permitted by the data protection legislation such as: a) purposes previously approved by you; b) processing of Data in order to finalize the contract, sale or supply of the service requested by you; c) execution of pre-contractual measures at your request; d) fulfillment of the legal obligations to which we are subject; e) safeguarding our legitimate interests or the legitimate interests of third parties, unless your interests prevail over them; f) assessment, exercise or defense of a right or legal claim; g) for reasons of significant public interest; h) marketing and advertising, in particular direct and / or non-direct marketing activities subject to express consent.

Among other things, we will process your Data for the specific purposes as indicated below and for example:

- for purposes related to the Agreement: specially to finalize the Agreement with you;
- · contact you in relation to the Agreement and for the management of the same;
- services rendered: in order to offer you the specific service requested and to execute the service purchased and requested by you if such data are essential to execute it or provide the service sold; give you a comprehensive consulting service. For the sole purpose of improving the quality of the customer care and staff training processes, moreover, we may process the personal data collected through the sample recording of telephone calls, in compliance with the privacy legislation and the provisions of the Authority Guarantor for the protection of personal data.

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- management of requests for legal guarantees, product compliance, assistance, requests for withdrawal, management and termination of the Agreement, management and resolution of reported problems;
- transfer of Data to third parties solely and exclusively for the management of the request if carried out with "remote" procedures via video, internet and only and exclusively for the personal data requested from the operators of the platforms used for these procedures.

Processing of your Data subject to consent: in the following cases we will process your Data only if you have given your express consent for: i) market research: we conduct market research regarding the interests of our customers, in order to offer them interesting and targeted offers. This includes, for example, customer satisfaction studies compared to our services. As part of market research activities, we exclusively process - whenever possible - anonymised and aggregated data. For such activities, however, we may also process your Data. ii) Advertising and marketing: if you have previously given your consent to this effect, we will process your Data to inform you of any offer that may interest you and we will contact you using the communication channels expressly authorized by you. The promotional and marketing activities in question can be carried out by sending telephone messages, such as by way of example SMS, and / or e-mail: of course, you can object to processing for these purposes at any time. In addition to the above, AIM may process your Data to comply with legal obligations and, therefore, to comply with any rule or provision of law that we intend and must comply with or for the security of the Data for measures that are essential to ensure the security of your Data and company data from external attacks and / or in order to prevent external attacks. Again to comply with legal obligations imposed on us and / or in order to prevent fraud or in case of litigation. Lastly, for mandatory fiscal, accounting and administrative purposes, always in compliance with current regulations. In some cases, certain features of the domain and / or the AIM application and / or certain promotions may be limited for individuals younger than that indicated on the AIM website and / or established by current regulations; in such cases, additional express consent may be required to use certain services and / or features. Also with regard to specific and additional services of some software (such as, for example, data sharing, user activities, device synchronization, weather synchronization, etc.), your explicit consent will be requested and certain features may be limited or excluded in the absence of specific consent or for subjects younger than that indicated on the AIM website and / or established by current regulations. Finally, AIM may process your Data to safeguard AIM's legitimate interests, except in the event that your interests prevail. This is done with sales checks to improve the services rendered and in an aggregate and anonymous form without indicating your identity or for studies aimed at improving the products and services rendered as well as our procedures.

- **5**. As expressly provided for by art. 5, co. 1, lett. e) GDPR, we will retain your Data only for the time necessary to process them for the purposes for which they are processed. If we process the Data for multiple purposes, they will be automatically deleted or saved in a format that does not allow any direct conclusions to be reached in relation to your identity, as soon as the last specific purpose has been fulfilled. In order for all your Data to be deleted or made anonymous in line with the principle of data minimization and in accordance with art. 5, co. 1, lett. e) of the GDPR. Indicatively, your Data will be kept for the following periods: fiscal / administrative obligations: 10 years; regulatory obligations regarding product warranty: 30 months; contractual obligations regarding the supply of services and products requested and supplied connected to the use of the same.
- **6**. AIM will process your personal Data on the basis of the security obligations relating to the processing of data pursuant to art. 32 GDPR. In order to guarantee an adequate level of data protection aimed at limiting the risk of using the same in an improper or illegal way, technical and organizational measures have been implemented that comply with internationally recognized IT standards, these measures are constantly subject to verification.
- **7**. Your Data may be shared with third parties including:
- subjects belonging to the AIM Group and / or AIM member companies always adopting adequate measures to ensure that your
 data are processed, protected and transferred in accordance with the applicable legal provisions, by way of example, in order
 to improve IT services, for reporting of the group, to verify complaints and requests, for the management of defects and damages
 of the goods sold, provision of the additional services requested; in cases where you have consented, for commercial or
 marketing purposes;
- external third parties to the extent that this is necessary or appropriate to achieve the purposes referred to in points 3 and 4, or
 as part of any legal obligation regarding information and reporting. These third parties are, in particular, external service
 providers including IT services, external consultants or collaborators, within the following contexts:
 - o sorting and transmission of communications to customers, as well as archiving and replacement of data;
 - o supply and management of administrative procedures and IT systems, communication networks and protection and security systems;
 - o customer assistance activities (also with call centers, help desks);

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- o after-sales assistance and technical interventions in the field of legal guarantee / lack of conformity of the products sold (companies producing or importing the products, authorized technical assistance centers); Appraisal, auditing and certification of financial statements;
- o Commercial information activities carried out by external companies with legal authorizations in compliance with current regulations, organization of events or advertising campaigns, detection of the quality of products and services, market surveys;
- o Professional consultancy and assistance.

AIM will appoint all the aforementioned subjects where necessary as Data Processors or they will act as autonomous controllers in compliance with current legislation, in the event that the relative conditions exist. AIM undertakes not to transfer your data outside the European Community.

8. Your rights. You, according to GDPR and other applicable data protection provisions, have specific and non-limited rights.

As an interested party, in particular the following rights under GDPR, towards AIM:

- Right of access (Article 15 GDPR): you may at any time request that you be provided with information on your data stored by
 us. This information refers, among other things, to the categories of data processed by us, the purposes of the processing, the
 origin of the Data if we did not obtain it directly from you, as well as the recipients to whom we may have transferred your Data,
 where applicable. You can receive a free copy of your Data which are the subject of the contract.
- Right of rectification (Article 16 of the GDPR): you may request a rectification of your Data. We will take adequate measures aimed at ensuring that your data stored and processed by us on an ongoing basis, are kept correct, complete, updated and relevant, based on the most recent information provided to us.
- Right of cancellation (Article 17 of the GDPR): you may request the cancellation of your Data, provided that the relevant conditions provided by law exist. For example, this could occur based on art. 17 of the GDPR:
- · if the Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- if you revoke the consent on which the data processing is based, and there is no other legal basis for the processing;
- if you object to the processing of your Data and there are no overriding legitimate reasons to proceed with the processing, or if you object to the processing of Data for direct marketing purposes;
- if the Data have been processed unlawfully; except that the treatment is necessary: for the fulfillment of a legal obligation that requires the processing of your Data; in particular as regards the retention periods of documents provided by the law; for the establishment, exercise or defense of a right or legal claim.
- Right to restriction of processing (Article 18 of the GDPR): you will be able to obtain a restriction on the processing of your data if these are not correct or if they are no longer necessary;
- Right to Data portability (Article 20 GDPR): You have the right to receive a copy of your Data, which you previously provided directly to AIM, and if you specifically request it, we undertake to transfer the same where possible to technical level to another data controller indicated by you;
- Right to opposition (Article 21 GDPR): You may make opposition at any time, for reasons related to your particular situation, to the processing of your Data, pursuant to art. 6, paragraph 1, letters e) or f) of the GDPR, or if the personal data are processed for direct marketing purposes. In this case, we will no longer process your Data. This last condition does not apply if we can demonstrate the existence of compelling legitimate reasons that justify the processing and that prevail over your interests, or if we need your data to ascertain, exercise or defend a right in court.
- Right to revoke the consent at any time (Article 13 of the GDPR) if the processing is based on consent without prejudice to the lawfulness of the processing based on the consent given before the revocation by sending the relevant request to the contacts listed below or through the technical methods eventually made available by AIM.

AIM will try to manage all requests within a reasonable period and, approximately, within 30 days, unless an extension is motivated and communicated.

Complaint: You always have the right to make a report and file a complaint with a competent data protection authority, pursuant to art. 77 GDPR.

In any case, you will find any wider reference in terms of current legislation on the website of our Guarantor for the protection of personal data at the internet address www.garanteprivacy.it and the full text of the GDPR can be consulted by accessing the following website:

http://eur-lex.europa.eu/legal ChristopIT/TXT/?uri=uriserv:OJ.L_.2016.119.01.0001.01.ITA&toc=OJ:L:2016:119:TOC For all requests for information and for the exercise of your rights, you can contact AIM Tech Srl

- by post to AIM Tech Srl, based in Cernusco sul Naviglio (MI), Via Cavalcanti n. 8, Italy,
- by phone at +39 02-9290571;
- by e-mail to the address: privacy@aim-sportline.com

AIM will promptly inform you if there are substantial changes with reference to the way your data are processed, we will promptly inform you of such changes.