

Pursuant to European Regulation 679/2016 regarding the protection of personal data – as currently implemented and interpreted, (the “GDPR”), **Tinaba S.p.A.** (hereinafter also "**Tinaba**"), with registered office at via Cerva, 28 - 20122, Milan (MI) - Italy - as **data controller** of the processing of the personal data collected, for the purpose of participating in this initiative (hereinafter the "**Initiative**") to carry out the activities indicated below, is required to provide the following information.

Types of data processed

The data that is collected, if you are not already a **Tinaba** user, for the purposes detailed below, are: personal and identification data of the person involved such as name and surname, e-mail address. Added to this are the navigation data, which the computer systems and software procedures used to operate the website could acquire during their normal operation. However, this information is not collected to be associated with identified users, but by its very nature it could, through processing and association with data held by third parties, allow users to be identified. This category of data includes the IP addresses or domain names of the computers used by users who connect to the site, the addresses in URI (*Uniform Resource Identifier*) notation of the requested resources, 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 (e.g. successful end, error) and other parameters relating to the operating system and the user's IT environment. These data are used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct functioning and are deleted immediately after processing. The data could be used to ascertain responsibility in case of hypothetical computer crimes against the site or requests from the authorities.

Source of the collected data

Personal data are directly provided by the user (hereinafter also "Interested person").

Purpose of the treatment

The data are processed for the following purposes:

1. processing of personal data for the execution of economic movements / transfers (hereinafter also "services") which will be performed at the request of the user and for the fulfilment of the legal obligations related to the economic transfers referred to above, as well as tax and / or accounting obligations;
2. protection of rights arising from these services as well as to manage corporate and / or financial transactions of interest to the Data Controller, if knowledge of these data is necessary to make evaluations by the counterparties and their consultants and provided that said counterparties and their consultants have signed a specific confidentiality agreement before having access to data;
3. internal statistical analysis, aggregated and in any case intelligible.

Processing methods

The user's personal data are processed by the Data Controller in compliance with the GDPR and the Italian Code for the protection of personal data (the “Privacy Code”).

Personal data will be processed in paper, computerized and telematic form and entered in the relevant databases which can be accessed by operators specifically designated by the Data Controller, who will be able to carry out consultation, use, processing, comparison and any other appropriate operations, including automated ones, in compliance with the legal provisions to protect the confidentiality and security of data as well as the relevance of the data with respect to the declared purposes. Specific security measures are adopted to prevent data loss, illicit or incorrect use and unauthorized access.

Nature of the provision of data

The provision of data and the related processing in relation to the purposes strictly connected to the requested services is mandatory. It follows that any refusal to provide data for these purposes could make it impossible for the Data Controller to carry out the requested services and legal obligations.

If the user joins the Initiative in the "participate publicly" mode, he authorizes Tinaba and the Beneficiary Institution to publish the name, surname and the amount paid in the list of members available respectively on the app and on the Tinaba's website and on the social communication channels (Facebook etc ..) as well as on the Beneficiary Institution's ones. If the user joins the Initiative in the "participate in confidential mode", only the amount of the payment will be published; the user data will remain anonymous.

Data provided voluntarily by the user

The optional, explicit and voluntary sending of e-mails to the addresses indicated on this site entails the subsequent acquisition of the sender's address, necessary to respond to requests, and any other personal data included in the message. Specific summary information will be progressively reported or displayed on the pages of the site set up for particular services on request.

Scope of communication and dissemination of data

In relation to the indicated purposes, the data may be communicated to:

- Beneficiary Institution, fundraising organizing company on whose behalf the Data Controller performs the services requested by the user;
- companies that collaborate with the Data Controller;
- companies connected and / or related to the Data Controller;
- financial administrations and other companies or public bodies in fulfilment of regulatory obligations;
- competent authorities and / or supervisory bodies for the fulfilment of legal obligations;
- companies and law firms and, more generally, consultancy firms or qualified entities that work for the undersigned, as well as contracting companies, self-employed workers to client companies specified in a separate list available from the Data Controller;

The subjects to whom the data may be communicated, who have not been designated Data Processors or Authorized persons by **Tinaba**, use the data as Data Controllers, carrying out an independent treatment with respect to that performed by **Tinaba**, for the purposes indicated in this statement. The updated list of third parties identified as Data Controllers or Processors is available from the Data Processor responsible for **Tinaba**.

Tinaba will communicate to the Beneficiary Institution only the name, surname and the amount paid by the user.

Additional user data may be communicated to the Beneficiary Institution with the user's express consent. In this case, the Beneficiary Institution may contact the user for future initiatives and for different purposes.

Duration of treatment

The data will be processed for as long as necessary to carry out the requested services and will be processed for 5 years starting from the termination of the relationship with the Data Controller. It is understood that, unless otherwise indicated by the interested party, such data will, however, be deleted from the servers at the end of the aforementioned period.

Use of Tinaba App

The interested party will be able to access the service provided through access credentials, or, through the use of the digital fingerprint (*fingerprint*), provided as an alternative and substitute method of access through access credentials.

No data will be collected and stored by the Data Controller through the fingerprint.

The interested party may at any time deactivate the use of the fingerprint as a method of access, at any time, through a special function located in the "Settings" section of Tinaba App.

Cookies

HTTP Cookies (more commonly called *Web cookies*, *tracking cookies* or simply *cookies*) are lines of text used to perform automatic authentication, session tracking and storage of specific information regarding users accessing the server, such as favourite websites or, in the case of internet purchases, the contents of their "shopping carts".

In detail, they are small text strings sent by a server to a *Web client* (usually a *browser*) and then sent back from the client to the server (without being modified) every time the customer accesses the same portion of the same web domain.

For the purposes of the provision of the Privacy Guarantor, No. 229 of 8 May 2014, two macro-categories are therefore identified: "technical" cookies and "profiling" cookies.

Technical cookies

Technical cookies are those used for the sole purpose of "carrying out the transmission of a communication over an electronic communications network, or to the extent strictly necessary for the provider of an information society service explicitly requested by the subscriber or user to provide that service. "

They are not used for other purposes and are normally installed directly by the Data Controller or operator of the website. They can be divided into navigation or session cookies, which guarantee normal navigation and use of the website (allowing, for example, to make a purchase or authenticate to access restricted areas); *analytics cookies*, assimilated to technical cookies when used directly by the site operator to collect information, in aggregate form, on the number of users and how they visit the site; functionality cookies, which allow the user to navigate according to a series of selected criteria (for example, the language, the products selected for purchase) in order to improve the service provided.

Profiling cookies

Profiling cookies are aimed at creating user profiles and are used in order to send advertising messages in line with the preferences expressed by the same part of surfing the net.

Each domain or part of it that is visited with the *browser* can set cookies. Since a typical Internet page, such as that of an online newspaper, contains objects that come from many different domains and each of them can set cookies, it is normal to host many hundreds of cookies in your *browser*. The purpose is to register but also sometimes, trace the

information relating to the user experience, going from one page to another of the site keeping the user authenticated, saving user preferences already entered (e.g. username, password), tracing the tastes and preferences of the user allowing to manage the presence or absence of targeted marketing initiatives. If restrictions are placed on their use, this will certainly have effects on the user's status during the consultation. Blocking or removing them from the browser cache could cause an incomplete use of the services offered by the web application. The site may make use of third-party cookies that allow the collection of visitor information, keywords used to reach the site, websites visited; in this case, information on the use that Tinaba makes of Cookies can be obtained at the address <http://www.tinaba.com>. This site may use both persistent and session cookies. The former continues to operate even after closing the browser in order to provide the user with faster access to the preferences set in a previous work session. The latter, however, have a duration related to the site use session and expire when the use session expires.

Social Media

The site could offer access doors to various "Social Media" services (which may include, without limitation, the now famous Facebook, Twitter etc.), said services, provide comment areas, bulletin boards, public forums, chats and other platforms of communication. The **Data Controller** regarding the specific use of chat services, advises to exercise caution regarding the dissemination of personal information when using these platforms. The terms of use and the privacy policies applicable to each of these social media, published on the site, govern the information provided. **Tinaba** does not perform any form of control over the use of personal information communicated in a public forum, a comment area, a bulletin board, making the user solely responsible for any disclosure.

Links to other websites

The <http://www.tinaba.com> site contains links to other websites that may have no connection with the data controller.

Tinaba does not control or monitor these websites and their contents. Tinaba cannot be held responsible for the contents of these sites and the rules adopted by them also with regard to data privacy and the processing of personal data during browsing operations. We therefore ask you to pay attention when making connections to these websites, through the links on our website and to carefully read their conditions of use and privacy notices. The Privacy Policy of <http://www.tinaba.com> does not apply to third party websites, nor is Tinaba in any way responsible for the privacy policy applied by said websites.

<http://www.tinaba.com> provides links to these websites solely to facilitate the user in searching and browsing and to facilitate hypertext links on the Internet to other websites. The activation of the links does not imply any recommendation or signalling by Tinaba for accessing and browsing these websites, nor any guarantee regarding their contents, services or goods supplied by them and sold to Internet users.

Rights of the interested parties

- In relation to the aforementioned treatments, the rights referred to in the GDPR and the Privacy Code regarding the Protection of Personal Data may be exercised, including: (i) obtainment of a confirmation of the existence of personal data relating to the interested party; (ii) obtainment of an indication of the origin of the personal data; (iii) obtainment of an indication of the purposes and methods of processing personal data; (iv) obtainment of an indication of the identification details of the Data Controller and of the data processors and of the designated representative; (v) obtainment of the updating, correction or integration of Personal Data; (vi) obtainment of the cancellation, transformation into anonymous form or blocking of data processed in violation of the law; (vii) the portability of the data as well as (viii) the "right to be forgotten" within the limits of the law.
- obtaining a certification that the updating, rectification, integration and cancellation operations have been brought to the attention, also as regards their content, to those to whom the personal data have been communicated or disclosed; objecting, in whole or in part, to the processing of personal data for legitimate reasons.

by contacting:

Tinaba S.p.A., based in Milan (MI), via Cerva, 28 - 20122 - Italy, by calling +39 02 00691500 or by sending an email to privacy@tinaba.it.

This notice does not exclude that further information is also provided verbally to the interested parties at the time of data collection.

It remains understood that use of the consent is in any case conditional upon compliance with the provisions of the currently applicable legal framework.

PLACE AND DATE

THE HOLDER
TINABA S.P.A

I consent to the communication of all data to the Beneficiary Institution to be contacted for different purposes and for further initiatives.

I AGREE

I DO NOT AGREE

PLACE AND DATE

THE HOLDER
TINABA S.P.A