

Statement on personal data processing for website users

Articles 13 and 14 of Regulation 2016/679/EU (hereinafter referred to as "GDPR")

Why this statement?

Barbarini e Foglia Srl (hereinafter also the "Data Controller") is committed to respecting and protecting your privacy and wants everyone to feel safe both during navigation through the site and whenever one decides to register by providing the Data Controller with their personal data in order to use the services available to Users and/or Customers. On this page the Data Controller will provide information on the processing of personal data of users who access or visit our website www.befgroup.com (the "Site"). The information provided herein applies only to the Barbarini e Foglia Srl website and not to any other website the users may access through links (please read these sites' privacy statements and policies). Reproduction or use of pages, materials and information contained within the Site, by any means and on any medium, is not allowed without the prior written consent of the Data Controller. Copying and/or printing is permitted for personal and non-commercial use only (for requests and clarifications please contact Barbarini e Foglia Srl at the addresses below). Other uses of content, services and information on this site are not allowed.

With regard to the content offered and the information provided, the Data Controller will ensure that the contents of the Site are kept up-to-date and reviewed, offering no guarantee as to the adequacy, accuracy or completeness of the information provided explicitly declining any liability for any errors of omission in the information provided on the Site.

Origin - Navigation data

Barbarini e Foglia Srl informs the Users that the personal data provided by them and acquired in the same process of request for information and/or contact, registration on the site and use of services via smartphone or any other tool used to access the Internet, as well as the data necessary for the provision of these services, including the navigation data and the data used for the possible purchase of the services offered by Barbarini e Foglia Srl, as well as the Users' navigation data will be processed in compliance with applicable legislation. The computer systems and software procedures used to operate this website require acquisition, during normal operation, of some personal data, whose transmission is implicit in and required by the use of Internet communication protocols. This information is not collected for the purpose of associating it to an identified user. However, due to its nature, this information might, if further processed and correlated with other data held by third parties, be used to identify navigating users. This category of data includes the IP addresses and/or domain names of the site users/visitor's computers, URI (Uniform Resource Identifiers) of requested resources, the time of request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the reply from the server (no error, error codes and so on) and other parameters regarding the User's operating system and computer environment. This data is used only to obtain anonymous statistical information about the Site and to make sure the Barbarini e Foglia Srl's Site is operating and performing as intended. Please note that the data could also be used, as required by the laws in force, to identify people involved and potentially responsible in case any cyber crime is committed against Barbarini e Foglia Srl's Site: however, except in case of investigation, the data on web contacts do not remain on the Site for more than a few days.

Origin - Data provided by the user

Barbarini e Foglia Srl collects, stores and processes the User's personal data in order to provide the services offered on the Site and to comply with the requirements of the laws in force. With regard to some specific services, Barbarini e Foglia Srl may also process data for commercial purposes.

The optional, explicit and voluntary sending of e-mails to the addresses indicated in the relevant section of the Website, as well as the filling of questionnaires (e.g. forms), posting on social networks and so on requires the subsequent acquisition of some personal data necessary to respond to requests. Please also note that when using the mobile connection to access digital content and services offered directly by Barbarini e Foglia Srl or by its partners, it may be necessary to transfer personal data to such third parties. In addition to that, the User may access the Site or

connect to areas where they may be able to publish information using blogs or bulletin boards, communicate with others, for example coming from the Data Controller page on Facebook[®], LinkedIn[®], YouTube[®], and other social networks, review products and offers and post comments or content. Before interacting with these areas, please carefully read the General Conditions of Use remembering that, under certain circumstances, the information published can be viewed by anyone with access to the Internet and all the information provided in the published content can be read, collected and used by third parties.

Purpose and legal basis of the processing

The data is processed for the following purposes:

- 1) all the purposes strictly connected to: registration on the website www.befgroup.com; the services and/or Apps developed or made available by Barbarini e Foglia Srl; using the related information services; managing contact requests for information; purchasing of services offered through the Barbarini e Foglia Srl website;
- 2) for activities related to the management of User/Customer requests and the sending of feedback which may include the promotional material, for the completion of the purchase order for the services offered and updates on the availability of any services;
- 3) for everything related to the fulfilment of EU and national legislation requirements, the protection of public order or the investigation and prosecution of offences;
- 4) direct marketing, i.e. sending of advertising material, carrying out market research or commercial communications regarding services offered by Barbarini e Foglia Srl; this activity may also concern services of companies of the Barbarini e Foglia Srl Group and require the sending of advertising/information/promotional material and/or invitations to participate in initiatives and events carried out by sending mail, e-mail or phone calls;

The use of the data for the means described in points 1), 2) and 3) as part of a pre-contractual and/or contractual phase or necessary to fulfil a user request or envisaged by a specific regulatory provision, is mandatory, and if data is not provided, it may be not possible for the user to receive information or to access any services. As regards point 4) above, consent to the processing of data by the user/customer is free and optional and it can always be revoked without consequences on the usability of the services, except for the impossibility for Barbarini e Foglia Srl to keep the user updated on new initiatives or on the offer of new services.

Barbarini e Foglia Srl may send commercial communications relating to services similar to those already provided, pursuant to Directive 2002/58/EU, using the e-mail or physical address provided by the user who can also object with the methods and using the contact details provided below.

Methods, processing logic, storage times and security measures

The processing is also carried out with the help of electronic or automated means and is carried out by Barbarini e Foglia Srl and/or by third parties that Barbarini e Foglia Srl can employ to store, manage and transmit the data. Organisation and processing logics will also be applied to the users' personal data for what concerns access and usage logs for online services, for the purposes mentioned above and in a way that ensures the security and confidentiality of the data. The personal data processed will be stored for the time required by the legislation applicable at the time. More specifically, in the sections of the Site dedicated to specific services, where the user's personal data are requested, the data are encrypted through a security technology known as Secure Sockets Layer (SSL). The SSL technology codes the data before they are exchanged (via the Internet) between the user's processing system and Barbarini e Foglia Srl's main systems, thereby making the data indecipherable by non-authorized persons and guaranteeing the confidentiality of the transmitted information. Furthermore, transactions made using electronic payment instruments are carried out using the payment service provider's platform (PSP) directly, and Barbarini e Foglia Srl only keeps the minimum amount of data necessary to manage any disputes. For what concerns protection of personal data, the user/customer is invited, pursuant to art. 33 of the GDPR, to report to Barbarini e Foglia Srl any circumstances or events from which a potential personal data breach may ensue in order to allow an immediate assessment and the taking of any measure aimed at countering this event by e-mailing privacy@befgroup.com. The measures adopted by the Company do not exempt the Customer from paying the necessary attention to the use, where required, of a password/PIN of adequate complexity, which will have to be updated periodically, especially if

the subject fears data may have been breached/disclosed to third parties, as well as stored carefully and made inaccessible to third parties, in order to avoid improper and unauthorized use.

Cookies

A cookie is a short string of text that is sent to the user's browser and, possibly, saved on their computer (alternatively on their smartphone/tablet or any other tool used to access the Internet); this usually happens every time the user visits a website. Barbarini e Foglia Srl uses cookies for various purposes, in order to offer a fast and secure digital experience, for example, allowing users to keep the link to the reserved area active while browsing through the pages of the Site.

The cookies stored on users' computers cannot be used to retrieve any data from the hard drive, infect the computer with viruses or identify and use the user's e-mail. Each cookie is unique for the browser and device used to access the Site or to use the Barbarini e Foglia Srl App. Generally speaking, the purpose of cookies is to improve the functioning of the website and the user's experience, even if cookies can also send advertising messages (as specified below).

Areas of communication and data transfer.

For the pursuit of the aforementioned purposes, the Data Controller shall send and have users'/customers' personal data processed by third parties the Data Controller knows and employs, in Italy and abroad, in the case third parties provide services upon request. The Data Controller will provide to these third parties only the information necessary to carry out the required services taking all the measures to protect the User's personal data. The data may be transferred outside the European Economic Area if this is necessary for the management of the contract with the user. In this case, the recipients of the data shall adopt security and obligations equivalent to those guaranteed by the Data Controller. The Data Controller will provide the partners only with the minimum amount of data needed for the services required. In any case, only the data necessary for the pursuit of the intended purposes will be provided and, where required, the guarantees applicable to transfers of data to third countries will be applied. Furthermore, personal data may be communicated to the relevant public subjects and authorities for the purposes of compliance with regulatory obligations or to ascertain responsibility in the event of computer crimes against the site as well as provided to third parties (having the role of data processors or if they supply electronic communication services, autonomous data controllers), who provide ICT and electronic communication services (e.g.: hosting services, website development and management) which Barbarini e Foglia Srl employs for the performance of tasks and activities of a technical and organizational nature that are instrumental to the functioning of the website. The subjects belonging to the above-mentioned categories act independently as data controllers

The personal data may also be known by the employees/consultants of Barbarini e Foglia Srl who are specially trained and appointed as "authorised to process".

The categories of recipients to whom the data may be communicated are available by contacting Barbarini e Foglia Srl at the addresses indicated below.

Rights of the data subject

The data subject can exercise at any time the rights granted by the law, including the right:

- a) to access their personal data, obtaining proof of the purposes pursued by the Data Controller, as well as of the categories of data involved, the recipients to whom they may be disclosed, the applicable storage period, the existence of automated decision-making processes;
- b) to obtain prompt rectification of inaccurate personal data pertaining to the data subject, without unjustified delays;
- c) to obtain the deletion of their data in the cases provided for by the law;
- d) to obtain the restriction of processing or object to processing itself, whenever this is allowed by the law;
- e) to request portability of the data provided to Barbarini e Foglia Srl, i.e. to receive them in a structured format, commonly used and readable by an automatic device also for the purpose of transmitting such data to another data controller within the limits and with the restrictions provided for by art. 20 of the GDPR.

Furthermore, the data subject can file a complaint to the Personal Data Protection Authority pursuant to Art.77 of the GDPR.

For the processing in point 4), the Customer can always revoke the consent and exercise the right to oppose direct marketing (in "traditional" and "automated" forms). Unless otherwise indicated, the opposition shall be taken as referring both to data provided via the traditional and automated forms.

Data Controller

The Data Controller, pursuant to art. 4 of the GDPR, is Barbarini e Foglia Srl, VIA ALEXANDRE GUSTAVE EIFFEL, 100 - 00148 ROME (RM) Italy, VAT number: 01187701006 - Taxpayer's code: 03352950582

The rights indicated above can be exercised by the Data Subject in the manner disclosed on the Company's website using the following references: privacy@befgroup.com.

The use of the Website by Customers and/or Users implies full knowledge and acceptance of the content and any information included in this version of the statement published by Barbarini e Foglia Srl at the time the site is accessed. Barbarini e Foglia Srl warns the user that this statement can be changed without notice and therefore recommends checking it regularly.

The Data Controller

Barbarini e Foglia Srl

This privacy statement was updated on July 21, 2021