

PRIVACY POLICY

Version 2.0 of 23/07/2021

Privacy Policy

These provisions for the protection of privacy, define how Fairnoise.com uses and protects the information provided to Fairnoise.com during the use of the present web site.

Fairnoise.com undertakes to ensure the protection of your privacy. When, during the use of this web site, you are asked to provide certain information that allows your identification, we assure you that such information will be used exclusively in respect of these provisions for the protection of your privacy.

fairnoise.com reserves the right to modify these provisions if necessary, through the updating of this page. We recommend that you regularly visit this page to ensure you approve of these changes. These provisions are valid from 1 July 2021.

Users Privacy Notice

Fairnoise is a brand of Europromas Srl VAT IT02057710184 established in: Via Carlo Emilio Gadda, 10 Sant'Alessio con Vialone (PV) Italy e-mail support@fairnoise.com, (hereinafter, "Owner"), owner of the internet site of origin of Users, (hereinafter the "Site"), as holder of the treatment of the personal data of users who browse and who want to take advantage of the services/products offered through this Site (hereinafter, respectively, the "Users" and "Service") below the privacy notice is provided, within the meaning of art. 13 of EU Regulation 2016/679 of 27 April 2016 (hereinafter, "Regulation" or "Applicable Law").

This Site and the services/products offered through the Site are reserved to those subjects who have reached their eighteenth year of age. Therefore the owner will not collect personal data relating to persons under the age of 18. At the request of users, the holder will promptly discard all personal data inadvertently collected and relating to subjects under the age of 18.

The Holder shall take the utmost account of the right to privacy and to the protection of personal data of its users. For any information in relation to this privacy policy, users can contact the owner at any time using the following modes:

- " "Sending a registered letter to the registered office of the holder;
- " "Sending an email message to the address support@fairnoise.com

The proprietor has not identified the representative of the Data Protection Officer (DPO OR DPO), since it is not subject to the obligation of this designation as provided for by art. 37 of the Regulation.

1. Purpose of Processing

The personal data of users will be processed lawfully by the holder within the indication of art. 6 of the Regulation for the following processing purposes:

A. contractual obligations and provision of the service, to allow browsing of the Site or to give execution to the General Conditions of sale, which are accepted by the user during the registration of the service; to fulfil the specific requirements of the user. The user data collected by the holder so that the latter may benefit from the Service may include the e-mail address, name and sur-

name, phone number where required and business data for billing. Unless the user gives the holder a specific and optional consent to the processing of your personal data for any additional purposes provided for in the following paragraphs, the personal data of the user will be used by the owner for the exclusive purpose of ascertaining the identity of the user (also through the validation of the email address), thus avoiding possible fraud or abuse, and contact the user only for reasons of service (e.g. send notifications related to the service). Without prejudice to what is provided elsewhere in this privacy notice, in no case will the holder make the personal user data accessible to other users and/or to third parties.

B. Administrative-accounting purposes, i.e. to carry out activities of organisational nature, administrative, financial and accounting, of which internal organisational activities and functional activities for the fulfilment of contractual and pre-contractual obligations;

C. legal obligations, or to fulfil obligations foreseen by the law, by a competent authority, by a regulation or by European legislation.

The provision of personal data for the purpose of the processing indicated above is optional but necessary, since the bestowal of the same will make it impossible for the user to browse the site and benefit from the service offered by the holder on the site.

The personal data that is necessary for the pursuit of the aims of the processing described in this paragraph 1 are indicated as mandatory.

2. Further processing purposes:

A) Newsletters

With the User's free consent and optional choice, some user's personal data (i.e. name, surname, email address and phone number) may be processed by the holder also for purpose of sending newsletters. Therefore, the user will receive a periodic newsletter from the holder, which will contain information in relation to the news relevant to the sector relating to digital theme initiatives.

In the case of lack of consent, the opportunity to pursue the purposes referred to in paragraph 1 above will not be compromised in any way.

In the event of a consensus, the user may at any time revoke the consent, by making a request to the holder with the modalities indicated in paragraph 5.

The user can also easily oppose to the further sending of promotional communication by just clicking on the appropriate link for the revocation of consent, which is present in each email containing the newsletter. Once the revocation of consent has been carried out, the holder will send the user an email message to confirm the withdrawal of consent.

The Holder wishes to inform the user, that, as a result of the cancellation of email newsletter notifications, caused by technical and operational reasons (e.g. formation of contact lists already completed just before the reception on the part of the holder of the cancellation request it is still possible that the user may continue to receive some additional newsletter mails. In case the user should continue to receive newsletter mail after 24 hours have elapsed from the cancellation, please report the problem to the Holder, using the contacts indicated in paragraph 5.

(B) Direct Marketing

With the User's free consent and optional choice, some personal data of the user (i.e. name, surname, email address and phone number) may be processed by the holder also for direct marketing purposes. Therefore, the holder may contact and send the user, direct mail, telephone calls to inform users of possible promotions, news or offer an appointment with the sales department of the holder to be able to submit all the services/products offered by the website and by Fairnoise Ltd.

In the event of a consensus, the user may at any time revoke the consent, by making a request to the holder with the modalities indicated in paragraph 5.

3. Processing modalities and duration of data retention

The owner will process the users' personal data by using manual tools and systems, with a logic solely correlated to the same purposes and however in such a way as to ensure the security and confidentiality of the data itself.

The personal data of the users of the site will be conserved for the duration strictly necessary to fulfil the primary goals outlined in the preceding paragraphs, or according to what is necessary for the protection in a civil seat of both the users' and the holder's interest

4. Scope of Communication and Dissemination of Data

Employees and/or collaborators of the Holder, responsible for managing the site, may come to knowledge of users' personal data. These subjects that are formally appointed by the Holder as "responsible for the processing", will treat the Users' data exclusively for the purposes set out in this notice and in observance to the forecasts of the applicable legislation.

Third parties who may collect personal data on behalf of the holder in the quality of "External Responsible of the processing", such as, for example, IT services providers and functional logistics for the operation of the Site, outsource vendors or cloud computing, professionals and consultants, may also be aware of users' personal data.

Users have the right to obtain a list of anyone who has been appointed by the holder, responsible for data processing; they can do this by making a request to the Holder with the modalities indicated in paragraph 5.

5. Rights of interested parties

Users will be able to exercise the rights guaranteed to them by the applicable legislation, by contacting the holder with the following modes:

- By sending a registered letter to the registered office of the holder;
- By sending an email to support@fairnoise.com

Pursuant to Applicable Law, the Holder shall inform users that they have the right to obtain information concerning (i) the origin of personal data; (ii) the purposes and methods of processing; (iii) the logics applied in case of processing carried out with the aid of electronic instruments; (iv) the identification of the owner and the staff responsible; (v) the subjects or categories of subjects to whom the personal data can be communicated or that can be informed in quality of staff responsible or in charge.

In addition, users have the following rights:

- A) To obtain access, updates, rectification or, if of interest, integration of data;
- B) To obtain the cancellation, transformation into anonymous or block any data processed in violation of the law, including that of which the conservation is not necessary in relation to the purposes for which the data was collected or subsequently processed;
- C) to obtain the declaration that the operations described in letters A) and B) have been brought to knowledge, also regarding their content, of those to whom the data has been communicated or diffused, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.
- D) To obtain the right to revoke this consent at any time if the treatment is based on their consent;
- E) To obtain the right to data portability (right to receive all the personal data that concerns them in a structured format, of common use and readable with an automatic device), the right to limitation of the processing of personal data and the right to cancellation ("right to oblivion");

F) To object in whole or in part, for legitimate reasons to the processing of personal data that concerns them, even if pertinent to the purpose of collection;

G) to object in whole or in part, to the processing of personal data that concern them for purposes of sending advertising material, direct sales, for market researches or commercial communication;

H) To oppose where personal data has been processed for the purpose of direct marketing, at any time, to the processing of their data carried out for this purpose including diffusing the extent to which it is connected to such direct marketing.

I) to oppose where they consider that the treatment that concerns them, violates the Regulation, the right to lodge a complaint to a Supervisory Authority.¹