

Website Personal Data Protection Policy

This Personal Data Protection Policy governs the access to and use of the services offered on the Website by Users, in their capacity as data subjects to whom protectable personal data belongs, pursuant to **EU Regulation 2016/679** on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as well as current regulations regarding personal data protection.

Data Controller

The Data Controller is the company Seven S.r.l. Unipersonale - Fiscal Code / VAT no. 00544860281 - Via Dell'Industria, 2/C - 35012 Camposampiero, Padua / Italy Tel + 39 049 8874518 - Fax +39 049 8874517 - seven@sevensrl.it

In line with its mission and values, Seven s.r.l. is committed to protecting the personal data of every individual, respecting the identity, dignity of every human being, and constitutionally guaranteed fundamental freedoms, in compliance with EU Reg. 2016/679 ("EU Reg.") concerning the protection of natural persons with regard to the processing of personal data and the free movement of such data ("Personal Data").

Our Policy

The protection of Personal Data is based on compliance with the principles illustrated in this document, which the Data Controller undertakes to disseminate, respect, and enforce among its shareholders, employees, collaborators, and the recipients or third parties with whom it collaborates within its business and mission.

The Data Controller is committed to ensuring that the Personal Data Protection Policy, and its consequences, are understood, implemented, and supported by all internal and external parties involved in its activities, taking into account its practical reality, investment capabilities, and, above all, its values.

In particular, Seven s.r.l. undertakes to:

- communicate and disseminate its policy regarding personal data protection;
- listen and pay attention to all its stakeholders – shareholders, employees, collaborators, investors, promoters, beneficiaries, clients, suppliers, consultants – taking due account of their requests regarding the processing of personal data and providing prompt feedback;
- process personal data: lawfully, fairly, and transparently, in line with constitutional principles and current legislation, specifically the new EU Reg., and only for the time strictly necessary for the intended purposes, including compliance with legal obligations;
- collect personal data limited to what is essential for carrying out activities (relevant and limited personal data);
- process personal data according to the principles of transparency only for the specific purposes expressed in its disclosures;
- adopt update and rectification processes for processed personal data to ensure that personal data is, as far as possible, accurate and up to date;
- store and protect the personal data in its possession using the best available preservation techniques, including the use of service contracts with suppliers who provide sufficient guarantees regarding the security of processing and ensure the protection of the Data Subject's rights;
- guarantee the continuous updating of personal data protection measures. This commitment will be constantly pursued under the principle of accountability, consistently implementing appropriate technical and organizational measures and suitable corporate policies to ensure and be able to demonstrate that processing is carried out in accordance with the EU Reg., taking into account the state of the art, the nature of the stored personal data, and the risks to which they are exposed;
- make the methods of Personal Data processing and storage clear, transparent, and relevant to ensure adequate security.

- > provide training and information to its shareholders and personnel, based on their specific roles, regarding the principles of lawfulness and fairness to which this Personal Data Protection Policy and the processing of personal data must conform, as well as compliance with the adopted safeguards;
- > encourage the development of responsibility and awareness across the entire organization toward personal data, viewed as data owned by the individual data subjects;
- > ensure compliance with legislative and regulatory provisions applicable to personal data protection, updating personal data protection management as necessary;
- > prevent and minimize, compatibly with available corporate resources, the impact of potential breaches or unlawful and/or harmful processing of personal data;
- > promote the inclusion of personal data protection within the continuous improvement plan that the organization pursues through its management systems.
- > This Personal Data Protection Policy will be brought to the attention of all internal personnel, shareholders, and collaborators, including through specific awareness meetings.

Purpose of this policy and its recipients

This policy is addressed to the users of the website www.sevensrl.it ("Website") and to all natural persons interested in the processing of their personal data by the Data Controller within the scope of its business activities ("Data Subject" or "User").

Access to certain sections of the Website and/or any requests for information or services by users may be subject to the submission of Personal Data, which will be processed in compliance with the EU Reg. For the use of specific services by the User, specific disclosures will be provided from time to time and, where necessary, specific consents for the processing of Personal Data will be requested.

This information is provided only for the Website and not for other websites consulted by users via any links that may be present on this site.

Definitions

The term personal data refers to the definition contained in Article 4, point 1) of the EU Reg., namely: "any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person" ("Personal Data"). The EU Reg. provides that, before proceeding with the processing of Personal Data — this term being understood, according to the definition in the EU Reg., as "any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction" ("Processing") — it is necessary that the person to whom such Personal Data belongs be informed about the reasons and purposes for which such data are requested and how they will be used.

Personal Data may be communicated to specific subjects considered recipients of such Personal Data. The EU Reg. defines a recipient of Personal Data as "a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not" (hereinafter the "Recipients").

Personal Data may also be communicated to specific subjects considered by the EU Reg. as "persons authorized to process Personal Data under the direct authority of the Controller or Processor" (hereinafter the "Authorized Persons").

Furthermore, according to the EU Reg., "public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as Recipients."

In this regard, this document aims to provide, in a simple and intuitive manner, all the useful and necessary information so that the User can provide their Personal Data in a conscious and informed way and, at any time, request and obtain clarifications and/or rectifications.

Categories of Data and Processing

Browsing data

The computer systems and software procedures used to operate this portal acquire, during their normal operation and only for the duration of the connection, certain personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified data subjects but, by its very nature, could, through processing and association with data held by third parties, allow for the identification of visiting users (e.g., IP addresses), the domain names of the terminals used, the URI (Uniform Resource Identifier) addresses of the requests, the time of the requests, etc. This

data, deleted immediately after processing, is used for the sole purpose of obtaining anonymous statistical information on the use of the site and to monitor its correct functioning. Web contact data is not stored for more than seven days, except in the case of potential cybercrimes against the sites. No data deriving from the service will be communicated or disseminated.

For further information, the Data Subject may read the Cookie Policy in the Privacy section of the site.

Contact data provided by the User

The optional, explicit, and voluntary sending of one's Personal Data to access services or make requests via email entails the subsequent acquisition by the Controller of the sender's address or any other personal data that will be processed to respond to the request or for the provision of the service, as well as to carry out all related activities and comply with legal obligations (e.g., tax-related). Failure to provide data, or providing partial or inaccurate data, would make it impossible not only to benefit from the requested services but also, in some cases, to comply with regulatory obligations.

To benefit from the services offered or make requests, it may be necessary to register by filling out a specific registration or initial contact form ("Form").

The provision of personal data indicated in the aforementioned form is mandatory to complete the registration process only for data marked with an asterisk (*); therefore, the failure to enter such data, or entering it partially or incorrectly, invalidates the registration and will thus not allow the use of the services.

Pursuant to Articles 12 and 13 of the EU Reg., the Website Forms may include disclosures for specific purposes related to the User's use of those specific parts of the site.

The processing will be carried out using both manual and electronic/telematic tools in compliance with current regulations and the principles of fairness, lawfulness, transparency, relevance, completeness and non-excess, data minimization, and accuracy, with organizational and processing logic strictly related to the pursued purposes and, in any case, in such a way as to guarantee the security, integrity, and confidentiality of the processed data, in compliance with the organizational, physical, and logical measures provided by current provisions. These will be implemented and increased from time to time, also in relation to technological development, to guarantee the confidentiality, availability, and integrity of the processed data.

Purposes of processing and legal bases

User browsing data is used for the sole purpose of obtaining statistical information on the use of the Site. As for the data provided directly by the User to benefit from the Controller's services or to make requests via email, it is collected and processed within the limits of the disclosure provided in the specific sections in order to respond to the requests received. The processing of Personal Data provided by filling out the initial contact form ("Form") and in the subsequent stages of processing regarding the selection of the Project is carried out for the purposes of: managing contact and service offer requests in all their stages, including contractual ones, or providing technical material.

The legal basis for processing, pursuant to Article 6 of the EU Reg., can be identified as: pre-contractual and contractual obligations within the framework of executing a contract; legal obligations to which the Data Controller is subject; and the necessity to pursue a legitimate interest (e.g., the right of defense) of the Data Controller.

Automated decisions

The Data Controller declares that it does not adopt decisions likely to affect the Data Subject based exclusively on the automated processing of their personal data. All decision-making processes associated with the processing purposes described above are carried out with human intervention.

By whom personal data is processed and communicated

Personal Data may be communicated to specific subjects considered Recipients or to Persons Authorized to process such Personal Data under the authority of the Data Controller. To correctly carry out all the processing activities necessary to pursue the purposes of this Disclosure, the following Recipients may process Personal Data:

- Employees and/or collaborators of the Data Controller performing the functions involved in the Controller's activities, who have received adequate instructions regarding security and the correct use of your personal data.
- Third parties who perform part of the processing activities and/or activities connected and instrumental to them on behalf of the Data Controller, such as individuals, companies, associations, or professional firms based in European Union countries, who have been entrusted with the task of performing services, including Website maintenance and other assistance and/or consultancy activities on behalf of the Controller. The third parties mentioned above essentially fall into the following categories: (a) entities with which the Controller has entered into collaboration and service supply agreements; (b) entities operating in the Sector; (c) credit institutions involved in the provision of Services; (d) Consultants.

- Public authorities or public bodies for the fulfillment of legal obligations to which the Data Controller is subject, and any other public entity legitimate to request data, in cases provided for by law.

Where required by law or to prevent or suppress the commission of a crime, Personal Data may be communicated to public bodies or the judicial authority.

It is understood that the data processed will be exclusively those necessary to achieve the specific purpose; consequently, data managed through third parties will be limited to that specific purpose.

Personal Data will not be disseminated.

International transfers of personal data

Personal Data will be processed by the Data Controller within the territory of the European Union. In the event that, for technical and/or operational reasons, it becomes necessary to use entities located outside the European Union, the transfer of your Personal Data, limited to the performance of specific processing activities, will be regulated in accordance with the provisions of Chapter V of the EU Reg. All necessary precautions will therefore be adopted to guarantee the total protection of your Personal Data, basing such transfer on: (i) adequacy decisions of the third destination countries expressed by the European Commission; (ii) appropriate safeguards provided by the third-party recipient pursuant to Article 46 of the EU Reg.; (iii) the adoption of binding corporate rules.

Retention period

One of the principles applicable to the processing of your Personal Data concerns the limitation of the retention period. In light of this principle, Users' Personal Data will be processed by the Data Controller only as long as necessary to pursue the purposes of this Disclosure. Browsing data will be stored according to the terms illustrated in the cookie policy.

Personal Data collected through the "contact form" will be processed for the minimum period necessary, i.e., until the termination of any existing pre-contractual and contractual relationships with the Data Controller, taking into account legal statutes of limitations and retention obligations of a fiscal or other nature provided for by law or EU Reg., for which the principle of data minimization (Art. 6, letter f) shall apply.

Commercial communications and withdrawal of consent

In the event that the data provided is used by the Data Controller to send informative material regarding the activities and products provided by the Controller, such communications may be carried out via email, telephone, or by sending advertising material to the Data Subject's domicile. However, specific consent may be required for this purpose.

Failure to provide data or consent for this purpose would have the sole consequence of making it impossible to carry out commercial communication activities.

The data provided for the aforementioned purposes will be stored for a period that is appropriate and relevant to the purpose pursued and, in any case, until the withdrawal of consent. In fact, as provided by the EU Reg., if the Data Subject has given consent to the Processing of Personal Data for one or more requested purposes, they may, at any time, withdraw it totally and/or partially without affecting the lawfulness of the Processing based on the consent given before the withdrawal.

The procedures for withdrawing consent are very simple and intuitive: it is sufficient to contact the Data Controller using the contact channels listed within this Disclosure.

In addition to the above and for the sake of simplicity, should the Data Subject find themselves receiving advertising emails from the Data Controller that are no longer of interest, they can simply click on the "unsubscribe" button at the bottom of the email to stop receiving any communication, including through additional contact channels for which consent had been obtained (SMS, paper mail, fax, phone calls, social media).

Rights of the Data Subject and their exercise

As provided for by Article 15 of the EU Reg., the Data Subject may access their Personal Data, request its rectification and updating if incomplete or erroneous, request its erasure if collected in violation of a law or the EU Reg., and object to the Processing for legitimate and specific reasons.

In particular, the rights that you may exercise at any time against the Data Controller are as follows:

Right of access: the right, pursuant to Article 15, paragraph 1 of the EU Reg., to obtain from the Data Controller confirmation as to whether or not Personal Data concerning them are being processed and, where that is the case, access to the Personal Data and the following information: a) the purposes of the Processing; b) the categories of Personal Data concerned; c) the Recipients or categories of Recipients to whom the Personal Data have been or will be disclosed, in particular Recipients in third countries or international organizations; d) where possible, the envisaged period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period; e) the existence of the right of the Data Subject to request from the Data Controller rectification or erasure of Personal Data or restriction of Processing of Personal Data concerning the Data Subject or to object to such Processing; f) the right to

lodge a complaint with a supervisory authority; g) where the Personal Data are not collected from the Data Subject, any available information as to their origin; h) the existence of automated decision-making, including profiling, referred to in Article 22, paragraphs 1 and 4 of the EU Reg. and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such Processing for the Data Subject.

Right to rectification: pursuant to Article 16 of the EU Reg., the rectification of inaccurate Personal Data concerning you. Taking into account the purposes of the Processing, you may also have incomplete Personal Data completed, including by means of providing a supplementary statement.

Right to erasure: pursuant to Article 17, paragraph 1 of the EU Reg., you may obtain the erasure of Personal Data concerning you without undue delay, and the Data Controller shall have the obligation to erase Personal Data where one of the following grounds applies: a) the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; b) you have withdrawn the consent on which the Processing is based and there is no other legal ground for the Processing; c) you have objected to the Processing pursuant to Article 21, paragraph 1 or 2 of the EU Reg. and there are no overriding legitimate grounds for the Processing; d) the Personal Data have been unlawfully processed; e) the Personal Data must be erased for compliance with a legal obligation in Union or Member State law. In some cases, as provided by Article 17, paragraph 3 of the EU Reg., the Data Controller is entitled not to provide for the erasure of your Personal Data if their Processing is necessary, for example, for compliance with a legal obligation, for reasons of public interest, for archiving purposes in the public interest or statistical purposes, or for the establishment, exercise, or defense of legal claims.

Right to restriction of processing: you may obtain the restriction of Processing, pursuant to Article 18 of the EU Reg., where one of the following applies: a) you contest the accuracy of the Personal Data (the restriction will last for a period enabling the Data Controller to verify the accuracy of such Personal Data); b) the Processing is unlawful but you oppose the erasure of the Personal Data and request the restriction of their use instead; c) although the Data Controller no longer needs the Personal Data for the purposes of the Processing, they are required by you for the establishment, exercise, or defense of legal claims; d) you have objected to Processing pursuant to Article 21, paragraph 1 of the EU Reg. pending the verification whether the legitimate grounds of the Data Controller override yours. In the case of restriction of Processing, Personal Data shall (and we will inform you before the restriction is lifted) only be processed, with the exception of storage, with your consent or for the establishment, exercise, or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.

Right to data portability: the Data Subject may, at any time, request and receive, pursuant to Article 20, paragraph 1 of the EU Reg., all Personal Data processed by the Data Controller in a structured, commonly used, and machine-readable format, or request its transmission to another controller without hindrance. In this case, it will be the Data Subject's responsibility to provide us with all the exact details of the new data controller to whom they intend to transfer the Personal Data, providing us with written authorization.

Right to object: pursuant to Article 21, paragraph 2 of the EU Reg., you may object at any time to the Processing of Personal Data concerning you for marketing purposes, which includes profiling to the extent that it is related to such direct marketing.

Right to lodge a complaint with a supervisory authority: without prejudice to your right to seek any other administrative or judicial remedy, if you believe that the Processing of Personal Data conducted by the Data Controller violates the EU Reg. and/or applicable legislation, you may lodge a complaint with the competent Data Protection Authority.

These rights may be exercised by contacting the Data Controller

To exercise the rights listed above, the Data Subject may contact the Data Controller at the following email address: privacy@sevensrl.com

For any request or need, the Data Subject shall send a communication addressed to:

Seven S.r.l. Unipersonale - Fiscal Code / VAT no. 00544860281 - Via Dell'Industria, 2 - 35012

Camposampiero, Padua / Italy

Tel + 39 049 8874518 - Fax +39 049 8874517

Furthermore, at any time, you may consult the "**Privacy Section**" of the Website, where you will find all information concerning the Personal Data processing policy applied by the Data Controller, the use and processing of Personal Data, and updated information regarding the contacts and communication channels made available to the Data Subject by the Data Controller.

The Data Controller
Seven s.r.l.

