

## Privacy Statement

This privacy statement applies to the products provided by Ferroli S.p.A. registered in Italy, Via Ritonda 78/A San Bonifacio-Verona (hereby the "Company", "we", "us") .

We show considerable respect on personal information protection. Protecting the personal privacy of every customer, vendor, and employee is a crucial part of gaining and keeping the trust of our stakeholders. We hope that the privacy policy outlined below serves as an indication of our commitment to protecting the security and privacy of your personal data.

When you use the services provided by us, we will collect, use and share your personal information in accordance with this privacy statement. This privacy statement includes the terms about collecting, storing, using, sharing and protecting your personal information. It is suggested that you should read the privacy statement completely to help you understand the way to protect your privacy. You can contact us through the contact information provided by us, if you are ever in any doubt about the privacy statement. If you disagree with any content of this privacy statement, you should immediately stop using the services provided by our platform. Once you continue to use any services provided by us, it means you have already agreed that we can lawfully collect, use, store, and share your information in accordance with this privacy statement.

The Privacy Statement was updated on October 5, 2022 (V1)

### 1. Our Collecting information

#### 1.1 Your personal data – what is it?

Personal data refers to any information relating to an identified natural person or can be used to identify a natural person. Identification can be by the data alone or in conjunction with any other data in the data controller's possession or likely to come into such possession.

#### 1.2 What roles do we play in processing your data?

We are the data controller with respect to processing your data (contact details below). This means that we decide how your personal data is processed and for what purposes. We know that you care how data about you is used and shared, and we appreciate your trust that we will do so carefully and sensibly.

#### 1.3 In what circumstances that your personal data will be collected?

- when you register/login to use our application.

- when you use our services and products.
- when you contact us via the various channels we offer you.

#### 1.4 Our collection of personal data

The personal data we collect include any and all data you provide to us when you enter into contract with us, register an account with us, update or add information to your account, or give us in any other way. Specifically, as below:

When you register or log in, our Data Processor will collect your email address, password and location (country/region), and a verification code will be sent to your registered email address by our Data Processor to verify your identity.

When you use **Google Actions** you have to talk to **Google Home**. Your voice input is sent to **Google** according to its privacy notice, and a voice command will be sent to the products for using it to understand what action should do for you. We and our Data Processor will not collect or store your voice recordings.

#### 2. How do we process your personal data?

We will keep your personal data up to date; by storing and destroying it securely; by collecting and retaining only the necessary that we need to service you; by protecting personal data from loss, misuse, unauthorized access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data. Our Data Processor will operate this App and process your personal information under our instruction.

We use your personal data for the following purposes:

- To deliver our services to you under our contract with you.
- To provide other services requested by you as described when we collect the information.
- To maintain the integrity and safety of our data technology systems which store and process your personal data.
- To detect and investigate data breaches, illegal activities, and fraud.

#### 2.1 Necessity to provide us data

You are not under any obligation to provide us any personal data. As noted below, the choice is yours. However, please note that without certain data from you, we may not be able to undertake some or all of our obligations to you under Terms of Service, or adequately provide you with our full range of services. If you would like to obtain more detail about this, please contact us following the instructions in the Contact Us section below.

## 2.2 Sharing your personal data

Your personal data will be treated as strictly confidential and will be shared only with the categories of data recipients listed below.

We may disclose your personal data to:

Since our Data Processor will operate the App under our instruction, it will have access to all information and proceed and store such accordingly.

Third parties involved in a legal proceeding if they provide us with a court order or substantially similar legal procedure requiring us to do so.

## 2.3 How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary for the given purpose for which your data is processed. If you will provide us, or have provided us, consent for us to process your data, we will process your data for no longer than your consent is effective. Notwithstanding the above, we may retain your personal data as required by the laws and regulations, as necessary to assist with any government and judicial investigations, to initiate or defend legal claims or for the purpose of civil, criminal or administrative proceedings. If none of the above grounds for us to keep your data apply, we will delete and dispose of your data in a secure manner according to our data protection policy.

## 2.4 Privacy of data subjects under the age of 16

Our products and services are not targeted to persons under the age of 16. We do not knowingly collect or process personal data from persons under the age of 16. Please note that if you are under the age of 16, you will need to provide us a written signed consent from your parent or guardian indicating that your parent or guardian has consented for us to process your data. Such consent form can be found by contacting our Privacy Department (contact details below).

## 3. Your rights and your personal data

You have the following rights with respect to your personal data:

- The right to request a copy of your personal data which we hold about you.
- The right to request that we correct any personal data if it is found to be inaccurate or out of date.
- The right to request to erase your personal data where it is no longer necessary for us to retain such data.
- The right to withdraw your consent to the processing at any time, where we rely on your consent to process your data.

- The right to request that we provide you with your data and where possible, to transmit that data directly to another data controller, where the processing is based on your consent or is necessary for the performance of a contract with you, and in either case we process the data by automated means.
- The right, where there is a dispute in relation to the accuracy or the lawfulness of our processing of your personal data, to request that a restriction is placed on further processing of your data.

If you would like to exercise any of the above rights, please do so through email to contact us (contact details below).

After receiving your request, we will evaluate your request and inform you how we intend to proceed on your request. Under certain circumstances in accordance with applicable laws and regulations, we may withhold access to your data, or decline to modify, erase, port, or restrict the processing of your data.

#### 4. Other important information

##### 4.1 Transfer of Data Abroad

We will need transmit data outside the EEA to the U.S. By using or joining our services and/or providing us with your information, you agree that we will collect, transmit, store and process your information outside the country/region you live in accordance with this Privacy Policy. We will make every effort to ensure that they comply with applicable legal requirements to the extent permitted by existing technology, for example, by executing standard contract terms. All of your data that we collect is used for user and product analysis after necessary confidential processing to provide you with better services. But in this case, we will take steps to protect your information appropriately.

##### 4.2 Further processing

If we wish to use your personal data for a new purpose not covered by this privacy statement, then we will provide you with a new notice explaining this new use prior to commencing such further processing for a new purpose, setting out the relevant new purpose and processing conditions. In such case, we will find a lawful basis for further processing, and whenever necessary we will seek your prior written consent to such further processing.

##### 4.3 Security

We protect your data using technical measures to minimize the risks of misuse, unauthorized access, unauthorized disclosure, and loss of access. Some of the safeguards we use are data pseudonymization, data encryption, firewalls, and data access authorization controls. We take our data security very seriously. Therefore, the

security mechanisms used to protect your data are checked and updated regularly to provide effective protection against abuse.

If you believe that the security of your data has been compromised, or if you like more information on the measures we use to protect your data, please contact us following the instructions in the Contact Us section below.

We work to protect the security of your personal information during transmission by using encryption protocols and software. We maintain physical, electronic, and procedural safeguards in connection with the collection, storage, and disclosure of customer personal information. It is also important for you to protect against unauthorized access to your password and to your applications. 4.4 Our lawful basis for processing your personal data?

We generally only store and process your personal data if you provide your explicit consent beforehand, e.g. when establishing contact or obtaining information. This allows you to decide whether you wish to transfer the data you supply when registering or responding to a survey for storage and use by us. If you agree, we can use your data to respond to inquiries or to improve our services and products, for example. We will collect, process and use the personal data supplied explicitly by you only for the purposes communicated to you and will not disclose it to third parties, or only with your permission, unless disclosure is necessary to negotiate and perform a contract with you, is required by law or to comply with a government agency or court orders, is necessary to establish or preserve a legal claim or defense and furthermore, is necessary to prevent misuse or other illegal activities, such as willful attacks on our systems for maintaining data security, or is carried out for any additional purpose that is directly related to the original purpose for which the personal data was collected. We further detail the circumstances of data disclosure to third parties in the section “Sharing your personal data” above.

#### 4.5 Whom should I contact?

If you have any questions about this privacy statement or you wish to exercise any right, or you have any requests to discuss with us, or if you have any unresolved complaints, please send an email to our Privacy Department specially established at the following address: [privacy@ferroli.com](mailto:privacy@ferroli.com). Upon receiving your email, we shall make every effort to respond within one month of receipt of your email. Your patience and understanding are highly appreciated. Given the complexity and quantity of requirements, the period may be extended for another 45 days as necessary. In case of deferred response, we will inform you of the reasons for the delay. If the limitation period set in this paragraph conflicts with the local laws, the local laws shall prevail.

If you disagree with us about our processing of your personal information, you may submit a mediation request or other requests to data protection regulator where you are located.

Ferrolì S.p.A.