

INFORMATION ON THE PROCESSING OF PERSONAL DATA

Pursuant to current legislation on the protection of personal data, with particular reference to art. 13 of Regulation (EU) 2016/679 ('GDPR') and Legislative Decree. 196/2003 and subsequent amendments. (collectively, the 'Privacy Policy'), Design Management S.r.l. with a sole shareholder as data controller ('DeMa' or 'Data Controller'), intends to inform those who participate, who are registered with The Mall Club, ('Participant') in the prize contest called "Shopping da vincere" ("Shop to win") ('Contest'), through the website <https://firenze.themall.it/en/events/shop-to-win> and <https://sanremo.themall.it/en/events/shop-to-win> ('Site'), regarding the methods and purposes of the processing of your personal data, released during the participation phase. The contest rules ('Regulations') are available at the following [link](#).

1. PERSONAL DATA PROCESSED

DeMa will process some personal data provided by the Participant at the time of finalizing the purchase (The Mall Club QR code) and at the time of registering on the Site including, in particular, name, surname, e-mail and telephone number. It is specified that DeMa will verify the correspondence between the e-mail address indicated by the Participant during registration and the one provided when registering with The Mall Club.

2. PURPOSE AND LEGAL BASIS OF THE PROCESSING

The provision of personal data is strictly necessary for participation in the Contest, with the consequence that, in the absence of the same, DeMa will not be able to allow participation.

The legal basis of the processing, therefore, must be identified in the need to execute the Regulation, first allowing registration and then participation in the Contest, in addition to carrying out all related operations (including those for the prize draw), pursuant to Art. 6.1, letter. b) of the GDPR.

The Participant's personal data may also be processed by the Data Controller for the purposes listed below:

- sending of service communications connected to the Contest, including any requests for assistance sent directly by the interested party, pursuant to Art. 6.1, letter. b) of the GDPR;
- fulfillment of legal obligations applicable to the Data Controller or orders of competent authorities, pursuant to Art. 6.1, letter. c) of the GDPR;
- defense or exercise in court of the Data Controller's rights, pursuant to Art. 6.1, letter. f) of the GDPR.

3. METHODS OF PROCESSING

The processing of personal data will be carried out, according to the principles of correctness, loyalty and transparency, through both electronic and manual tools, constantly under the supervision of suitable measures to guarantee the security and confidentiality of the data, in full compliance with current legislation, above all in order to reduce the risks of destruction, loss, modification or unauthorized disclosure or access, accidentally or illegally, to the data processed.

4. WHO WILL PROCESS THE DATA

Personal data will be processed exclusively by DeMa employees or collaborators duly authorized in writing and trained on the security levels necessary to guarantee adequate data protection.

Any person who, due to the performance of support services or in any case connected to the Contest, will have the opportunity to access and process the data on behalf of DeMa, will act by virtue of specific agreements stipulated with the Data Controller as data controller pursuant to Art. 28 of the GDPR (e.g. the company Clipper S.r.l.).

It is understood that the data may be communicated to independent third party data controllers, such as, by way of example, the Judicial Authority and other competent authorities, to fulfill legal obligations and/or their requests and orders.

5. TRANSFER OF DATA ABROAD

The processing activities will take place exclusively within the European Economic Area. Participants' data will therefore not be transferred to third countries.

6. RETENTION TIMES

DeMa will process and keep personal data only for the time strictly necessary to achieve the purposes indicated above. In particular, the Participant's data will be kept for the time strictly necessary for the management of the Contest, including the delivery of the prizes to the winners, and will be deleted within six months of the draw, in compliance with the deadlines established by the regulations regarding Contests and prize operations.

Without prejudice to the above, the data will be retained by the Data Controller even for longer periods, if this is required by law or by provisions issued by the competent authorities, as well as to allow the Data Controller to ascertain, exercise or defend his rights in court.

7. PARTICIPANT RIGHTS

The Participant may at any time exercise the rights granted to them by asking:

- confirmation of the existence or otherwise of personal data concerning them, receiving communication thereof in an intelligible form, together with the indication, if requested, of the purposes of the processing, of the categories of personal data in question, of the recipients to whom the data may be communicated, the retention period, your rights and the existence of an automated decision-making process, including profiling;
- updating and rectification of your data without unjustified delay;
- the deletion of your data, in the cases provided for by the art. 17 of the GDPR;
- the limitation of processing - i.e. a temporary block - where one of the circumstances referred to in the art. 18 of the GDPR;
- the portability of the data, receiving a copy in a structured format, commonly used and readable by an automatic device, being able to transmit such data to another data controller without impediments by DeMa.

The Participant also has the right to lodge a complaint at any time with the Guarantor Authority for the protection of personal data, if he/she believes that the processing carried out by DeMa violates the Privacy Law.

English courtesy translation

8. CONTACTS OF THE DATA CONTROLLER AND THE DATA PROTECTION OFFICER

The data controller is Design Management S.r.l with a sole shareholder with registered office in Milan (MI), Via San Paolo n. 7, VAT number 05063610488.

To exercise the above-mentioned rights and for any further information relating to the processing of personal data described in this statement, you can contact DeMa's Data Protection Officer at any time at the following email address electronics: dpo@themall.it