

## INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA

Pursuant to the applicable legislation on the protection of personal data, with particular reference to Article 13 of Regulation (EU) 2016/679 ("GDPR") and to Legislative Decree 196/2003, as subsequently amended (together, the "Privacy Legislation"), Design Management S.r.l., in its capacity as data controller ("DeMa" or "Controller"), intends to inform those who, registered with The Mall Club ("Participant"), will take part in the prize competition called "Touch the Stars" ("Competition"), through the websites <https://firenze.themall.it/en/events/reach-for-the-stars> or <https://sanremo.themall.it/en/events/reach-for-the-stars> ("Website"), about the methods and purposes of the processing of their personal data, provided during participation. The competition rules ("Rules") are available at the following link <http://themall.it/pdf/stars-regulation.pdf>.

### 1. PERSONAL DATA PROCESSED

DeMa will process certain personal data provided by the Participant at the time of completing a purchase (QR code from The Mall Club) and/or at the time of registration on the Website, including first name, last name, email address, and phone number. It should be noted that DeMa will verify the correspondence between the email address indicated by the Participant during registration and the one provided upon joining The Mall Club.

### 2. PURPOSES AND LEGAL BASES OF PROCESSING

The provision of personal data is strictly necessary for participation in the Competition; therefore, without it, DeMa will not be able to allow participation.

The legal basis for processing must thus be identified in the need to execute the Rules, enabling registration and subsequent participation in the Competition, as well as carrying out all related operations (including prize draws), pursuant to Article 6.1(b) GDPR.

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

- sending service communications related to the Competition, including any assistance requests submitted directly by the Participant, pursuant to Article 6.1(b) GDPR;
- compliance with legal obligations applicable to the Controller or orders from competent authorities, pursuant to Article 6.1(c) GDPR;
- the establishment, exercise, or defense of the Controller's legal claims, pursuant to Article 6.1(f) GDPR.

### 3. PROCESSING METHODS

The processing of personal data will be carried out, in accordance with the principles of fairness, lawfulness, and transparency, through both electronic and manual tools, under constant supervision of appropriate measures to ensure the security and confidentiality of the data, in full compliance with applicable law, particularly to reduce the risks of destruction, loss, alteration, unauthorized disclosure, or accidental or unlawful access to the processed data.

### 4. WHO WILL PROCESS THE DATA

Personal data will be processed exclusively by DeMa employees or collaborators, duly authorized in writing and instructed regarding the necessary security measures to ensure adequate protection of the data.

Any party who, by reason of providing support services or otherwise related to the Competition, will have access to and process the data on behalf of DeMa, will act under specific agreements entered

into with the Controller as data processors pursuant to Article 28 GDPR (e.g., the company Clipper S.r.l.).

It is understood that data may also be disclosed to independent controllers, such as, by way of example, the Judicial Authority and other competent authorities, in order to comply with legal obligations and/or their requests and orders.

## **5. DATA TRANSFER ABROAD**

Processing activities will take place exclusively within the European Economic Area. Therefore, Participants' data will not be transferred to third countries.

## **6. DATA RETENTION PERIOD**

DeMa will process and retain personal data only for the time strictly necessary to achieve the purposes outlined above. Specifically, the Participant's data will be stored for the period strictly necessary to manage the Competition, including the delivery of prizes to winners, and will be deleted within six months of the draw, in accordance with the timeframes provided by legislation on prize competitions.

Without prejudice to the above, data will be retained by the Controller for longer periods where required by law or by orders issued by competent authorities, as well as to enable the Controller to establish, exercise, or defend its legal rights in judicial proceedings.

## **7. PARTICIPANT'S RIGHTS**

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

- confirmation as to whether or not personal data concerning them exist, and, if so, to receive intelligible communication thereof, along with, upon request, information on the purposes of the processing, the categories of personal data concerned, the recipients to whom the data may be disclosed, the retention period, their rights, and the existence of automated decision-making, including profiling;
- the updating and rectification of their data without undue delay;
- the erasure of their data, in the cases provided for by Article 17 GDPR;
- restriction of processing—i.e., temporary blocking—where one of the circumstances under Article 18 GDPR applies;
- data portability, by receiving a copy of their data in a structured, commonly used, and machine-readable format, and the right to transmit those data to another controller without hindrance from DeMa.

The Participant also has the right to lodge a complaint at any time with the Data Protection Authority, if they believe that the processing carried out by DeMa violates the Privacy Legislation.

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

The Controller is Design Management S.r.l. Unipersonale, with registered office in Milan (MI), Via San Paolo no. 7, VAT number 05063610488.

For the exercise of the above rights and for any further information regarding the processing of personal data described in this notice, the Participant may contact DeMa's Data Protection Officer at any time at the following email address: [dpo@themall.it](mailto:dpo@themall.it).