

# INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR THE EVENT "THE MALL RACE"

The company Design Management S.r.l. (hereinafter "DeMa" or "Data Controller"), pursuant to art. 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data (hereinafter, the "GDPR") and of Legislative Decree 196/2003 as amended subsequently ("Privacy Code"), provides the following information on the processing of personal data as data controller of personal data relating to participants in the automotive event called "The Mall Race" to be held from 17 to 19 April 2026 ("Event"), according to the regulations available at the following link.

## 1. DATA CONTROLLER AND DATA PROTECTION OFFICER

The Data Controller is Design Management S.r.l., with registered office in via San Paolo, 7, 20121, Milan, Tax Code 05063610488, VAT number: 05063610488, email: designmanagement@pec.themall.it.

The Data Controller has designated a Data Protection Officer ("**DPO**"), who can be contacted directly at the following email address: dpo@themall.it.

#### 2. DATA CONTROLLER

The Data Controller has appointed as Data Processor the company Class&Classic SAGL, with registered office in Via Stazione 18 Bellinzona (Switzerland) CHE- 443.971.581.

## 3. PERSONAL DATA PROCESSED

- 3.1 The data subject to processing refer to the information entered by participants for registration for the Event on the dedicated page on the Data Controller's website. These data can be traced back (a) both to the so-called common data (e.g. name, surname, telephone, email, domicile and residence, license number, size, car license plate, etc.), (b) and to the so-called special data pursuant to art. 9 of the GDPR (e.g. food intolerances).
- 3.2 It is also understood that the Data Controller will also process, where authorised, the image of the data subject during the Event.

## 4. DATA SOURCE

With reference to the registration of the co-driver, it is specified that the personal data processed for the purposes of participation in the Event have been communicated to DeMa by the person who registered for the Event on the website, which undertakes to provide the interested party with this information.



#### 5. PURPOSES OF PROCESSING AND LEGAL BASES

5.1 The data provided and communicated to DeMa pursuant to article 3.1 letter (a) above will be processed for registration for the Event. The processing is to be considered lawful pursuant to art. 6 (1) (b) GDPR (performance of a contract to which the data subject is a party, including precontractual measures).

With limited reference to the processing of food intolerance, the legal basis identified by the Data Controller is Article 9, paragraph 2, letter a) of the GDPR (explicit consent of the data subject).

5.2 The personal data collected by DeMa pursuant to article 3.2 above will be processed for the purpose of publishing the images of the participants taken during the Event by DeMa on DeMa's social channels for promotional purposes. The processing is to be considered lawful pursuant to Article 6, paragraph 1, letter a) of the GDPR (consent of the data subject).

#### 6. PROCESSING METHODS

The processing of personal data is carried out using manual, IT and/or telematic tools with organisational and processing logics strictly related to the purposes and in any case in such a way as to guarantee the security, integrity and confidentiality of the data.

# 7. RETENTION PERIOD

DeMa will retain the data for the time necessary to achieve the purposes for which they were collected pursuant to paragraph 5 above. In any case, the data will be stored for a maximum period of 1 (one) month after the termination of the Event, after which the data will be deleted.

With respect to the publication of images on DeMa's social channels, it should be noted that, given the nature of the medium used, any published content bearing the image of the participants will remain online for a period of time that cannot be determined to date, but in any case compatible with the company's communication strategies. For further clarification on this aspect, you can contact the company at the addresses referred to in paragraph 1.

#### 8. COMMUNICATION AND DISSEMINATION

DeMa may make the personal data of participants exclusively available to:

- collaborators, employees, duly authorized and instructed to process pursuant to Article 29 of the GDPR and 2-quaterdecies of Legislative Decree 196/2003, within the scope of their duties, who operate under the responsibility of DeMa;
- DeMa's suppliers, identified as data processors pursuant to Article 28 of the GDPR.

It is understood that the personal data processed may be communicated to judicial authorities or other competent authorities, in order to comply with legal obligations and/or their requests or orders.



As indicated in the previous point, the images of the participants can be published on DeMa's social channels.

#### 9. TRANSFER OF PERSONAL DATA

Your personal data will be transferred to Switzerland, which is a member of the EFTA (European Free Trade Association).

#### 10. RIGHTS OF THE DATA SUBJECTS

Pursuant to articles 15 to 21 of the Regulation, the interested party may exercise at any time the rights granted to him or her by law, including the right to obtain:

- from the Data Controller confirmation of the existence of processing of personal data and the right to access such data;
- the deletion of data, where admissible;
- the correction of inaccurate data and/or the integration of incomplete data;
- the limitation of processing, in the cases envisaged;
- data portability, i.e. to obtain data in a structured, commonly used and machine-readable format, as well as the right to transmit such data to another Data Controller without hindrance:
- the objection, for legitimate reasons, to the processing.

In addition, we inform you that the interested party has the right to lodge a complaint with the Data Protection Authority, according to the procedures described on the website <a href="www.gpdp.it">www.gpdp.it</a>.

# 11. CONTACTS

You can exercise the rights described above under the GDPR by contacting us at the following address privacy@themall.it.

For any further information regarding the processing of personal data carried out by DeMa, you can also contact the DPO at dpo@themall.it.

Date of last update: November 2025