PRIVACY POLICY – WEBSITE USERS

Privacy policy in accordance with Article 13 of EU Regulation 2016/679 ("GDPR")

1. Kirey and the Regulation (EU) 2016/679

Kirey and the Companies under its control and co-ordination, pursuant to and for the purposes of article 2359 of the Italian Civil Code, Kirey S.r.l. ("**Kirey Group**" or the "**Companies**"), considers the protection of personal data to be of primary importance, ensuring that the relevant processing, carried out by any means, whether automated or manual, takes place in strict compliance with the guarantees and rights recognised by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 ("**Regulation**" or "**GDPR**") on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter the "Regulation") and by the further applicable laws on the protection of personal data.

This policy on the processing of personal data - "**Policy**" - applies to the Users ("**Data Subjects**") who browse Kirey Group's websites.

The Companies of Kirey Group that will jointly process your Personal Data for the purposes set out in paragraph 4 of this Policy are the following:

- **Kirey S.r.l.** with registered office in Viale Francesco Restelli 5, 20124 - Milan, registered in the Milan Companies' Register, Tax Code and VAT Number 06729880960, R.E.A. 1910802;
- **Kubris S.r.l.** with registered office in Viale Francesco Restelli 5, 20124 - Milan, registered in the Milan Register of Companies, Tax Code and VAT Number 10084830966, R.E.A. 2503708;
- **Sibyl S.r.l.** with registered office in Viale Francesco Restelli 5, 20124 - Milan, registered in the Milan Register of Companies, Tax Code and VAT Number 06626020967, R.E.A. 2122766;
- **Kirey Advisory S.r.l.** with registered office in Viale Francesco Restelli 5, 20124 - Milan, registered in the Milan Register of Companies, Tax Code and VAT Number 13507320961, R.E.A. 2727430;
- **Kirey Forward S.r.l.** with registered office in Viale Francesco Restelli 5, 20124 – Milan, registered in the Milan Register of Companies, Tax Code and VAT Number 14410730965, R.E.A. 2781180.

The above-mentioned Companies act as Joint Data Controllers, meaning "two or more companies that jointly determine the purposes and means of the processing" as provided for in Art. 26 of the Regulation. In this regard, the Companies have signed a specific agreement pursuant to Art. 26 of the GDPR, the extract of which may be presented to the data subjects upon their specific request.

The Companies may be reached through the following channels:

- writing to Kirey Group c/o Kirey S.r.l., Viale Francesco Restelli 5, Milan;
- via e-mail to the mailbox privacy@kireygroup.com.

2. Data Protection Officer (DPO) of Kirey Group

To simplifying communication between you and each Data Controller, Kirey Group has decided to identify and appoint a Data Protection Officer (DPO) as provided for in Articles 37-39 of the Regulation. The DPO can be reached via email writing to the address dpo@kireygroup.com and/or by writing to the Data Protection Officer of Kirey Group at Kirey S.r.l., Viale Francesco Restelli 5, Milan (hereinafter referred to as "**DPO**").

3. Processed data

Companies listed at point 1) may collect and process the following personal data:

- browsing data: the computer systems and software used to operate this site collect, during their normal operation, various personal data whose transmission is involved in the use of Internet communication protocols. This information is not collected in order to be associated with specifically identified interested

parties, but by its own nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes the IP addresses or domain names of the computers used by users who connect to the site, the URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the type of method used to submit the request to the server, the size of the file returned, the number code indicating the status of the response from the server (successful, error, etc.) and other parameters relating to the user's operating system and IT environment. This data is used for the only purpose of obtaining anonymous statistical information on the use of the site and to monitor its correct functioning and is deleted immediately after processing. The data could be used to determine responsibility in the event of potential computer crimes to the site's detriment: apart from this possibility, data on web contacts do not currently remain for more than seven days;

- data provided by the user: the facultative, explicit and voluntary transmission of personal data by the user in the forms present on this website implies the acquisition of the data provided by the sender, necessary for the provision of the requested service. Specific summary information will be progressively reported or displayed on the pages of the website set up for particular services on request.
- cookies and other tracking technologies: for more information on the cookies used by this website, please refer to the Cookie Policy provided on each individual website.

4. Purpose of the processing, legal basis, retention period and provision of data

The purposes of the processing, as well as its legal basis, the storage period and the nature of the provision of data are set out in the following:

a) **browsing the website;**
b) **filling in of the contact form (or chat on the site) and sending of communications to the Data Controller;**
c) **downloading information material from the website;**
d) **commercial and marketing communications.**

Legal basis: the processing for purpose a) is necessary for the pursuit of the legitimate interests of the Companies or of Third Parties, provided that the interests or the fundamental rights and freedoms of the Data Subject requiring the protection of personal data are not overridden, having regard to the reasonable expectations of the Data Subject based on his or her relationship with the Controller. The processing is, therefore, lawful under Art. 6(1)(f) and Recital 47.

The processing for the purposes b) and c), is necessary for the performance of pre-contractual and/or contractual measures. The processing is, therefore, lawful within the meaning of Article 6(1)(b) of the GDPR.

Processing for the purpose d) is based on the consent of the Data Subject pursuant to Article 6(1)(a) of the GDPR. The processing will be based, if provided, on free, explicit and unambiguous consent.

Retention periods: personal data processed for the purpose a) are retained for the duration of the browsing session (for details see the cookie policy). Personal data processed for purposes b) and c) are retained for 10 years after the termination of the relationship for any reason whatsoever (except for any interruptive or suspensive events). Personal data processed for purposes whose legal basis is consent are retained until consent is revoked.

Nature of the provision of data: the provision of data is mandatory, as it is essential to be able to perform contractual obligations (e.g. request for information). Except for what has been specified for navigation data (which are necessary in order to allow navigation of the website), for the purposes whose legal basis is legitimate interest, the provision of data is optional and, in the absence, thereof, your data will not be processed for the pursuit of such purposes. For the purposes whose legal basis is consent, the provision of data is optional and, in the absence, thereof, your data will not be processed for the pursuit of that purpose.

5. Data Subjects or categories of Data Subjects

Personal data will not be disclosed. However, personal data may be communicated to and processed by specifically authorised parties acting, pursuant to Article 29 GDPR and 2-quaterdecies of Legislative Decree 101/2018 (including any System Administrators appointed for this purpose whose list may be requested from Kirey Group), under the authority of Kirey Group itself to external parties who will process the data as autonomous Data Controllers or Data Processors pursuant to Article 28 GDPR on the basis of specific instructions provided regarding the purposes and methods of processing.

6. Data transfer to a non-EU country and/or international organisation and guarantees

Under no circumstances will the personal data collected and processed be transferred outside the EEA countries.

7. Data processing methods

The collection and processing of personal data will be carried out by means of manually, computerised and telematic tools and with logics strictly related to the purposes. It should be specified that no automated decision-making processes are carried out for the purposes set out in this policy.

8. Data Subjects' rights

The Data Subject may exercise his or her rights pursuant to Articles 15-22 of the GDPR by contacting each Company, sending an e-mail to privacy@kireygroup.com or writing to the addresses listed in paragraph 2 of this Privacy Policy.

The Data Subject has the right, at any time, to request the Companies to access (Art. 15), rectify (Art. 16) or delete (Art. 17) his or her personal data, or restrict its processing (Art. 18). The Companies shall inform (art. 19) each of the recipients to whom the personal data have been transmitted of any rectification or cancellation or restriction of processing carried out. The Companies shall inform the Data Subject of these recipients if the Data Subject so requests. In such cases, he/she has the right to revoke the consent provided without impairing the lawfulness of the processing based on the consent before revocation. Furthermore, the Data Subject has the right to oppose the processing of data, including for processing based on legitimate interest. In the event that he/she considers that the processing of personal data carried out is in breach of the provisions of the GDPR, the Data Subject has the right to file a complaint with the competent Data Protection Authority, in particular in the Member State in which he/she normally resides or works or in the place where the alleged breach of the Regulation occurred (contact details of the competent Data Protection Authority can be found at the following link: https://www.garanteprivacy.it/home/footer/contatti), or to take appropriate legal action.

9. Further information

The Data Controller reserves the right to modify, update, add or remove parts of this privacy policy at its own discretion and at any time. In order to facilitate this verification, the policy will contain the date of update.

Latest update: **July 2026**