# PRIVACY POLICY – WEBSITE USERS

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

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

Kirey and the companies subject to the control and coordination of Kirey S.r.l. pursuant to and for the purposes of Article 2359 of the Italian Civil Code (hereinafter, "Kirey Group" or the "Companies") have for many years regarded the protection of personal data as being of fundamental importance, ensuring that the relevant processing, whether carried out by automated or manual means, takes place in full compliance with the safeguards and rights recognised under 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 and on the free movement of such data (hereinafter, the "Regulation"), as well as any other applicable personal data protection legislation.

This policy on the processing of personal data (the "Policy") applies to users (hereinafter, the "Data Subjects") who access the Kirey Group websites.

The Kirey Group companies that will jointly process your Personal Data for the purposes set out in paragraph 4 below are as follows:

- **Kirey S.r.l.** with registered office at Viale Francesco Restelli 5, 20124 Milan, registered with the Milan Companies Register, Tax Code and VAT No. 06729880960, R.E.A. No. 1910802;
- **Kubris S.r.l.** with registered office at Viale Francesco Restelli 5, 20124 Milan, registered with the Milan Companies Register, Tax Code and VAT No. 10084830966, R.E.A. No. 2503708;
- **Sibyl S.r.l.** with registered office at Viale Francesco Restelli 5, 20124 Milan, registered with the Milan Companies Register, Tax Code and VAT No. 06626020967, R.E.A. No. 2122766;
- **Kirey Advisory S.r.l.** with registered office at Viale Francesco Restelli 5, 20124 Milan, registered with the Milan Companies Register, Tax Code and VAT No. 13507320961, R.E.A. No. 2727430;
- **Kirey Forward S.r.l.** with registered office at Viale Francesco Restelli 5, 20124 Milan, registered with the Milan Companies Register, Tax Code and VAT No. 14410730965, R.E.A. No. 2781180.

The above Companies act as Joint Data Controllers, meaning "two or more companies that jointly determine the purposes and means of processing", as provided for under Article 26 of the Regulation. Accordingly, the Companies have entered into a specific agreement pursuant to Article 26 of the GDPR, an extract of which may be made available to Data Subjects upon their specific request.
The Companies may be contacted through the following channels:

- by writing to Kirey Group, care of Kirey S.r.l., Viale Francesco Restelli 5, 20124 Milan;
- by sending an email to privacy@kireygroup.com.

## 2. Data Protection Officer (DPO) of Kirey Group

In order to facilitate relations between you and each Data Controller, Kirey Group has decided to appoint a Data Protection Officer (DPO), as provided for under Articles 37 to 39 of the Regulation. The DPO may be contacted by sending a written communication to dpo@kireygroup.com and/or by writing to the Kirey Group Data Protection Officer, care of Kirey S.r.l., Viale Francesco Restelli 5, Milan (hereinafter, the "DPO").

## 3. Processed data

The Companies referred to in paragraph 1) may collect and process the following personal data:

- **Browsing data:** the IT systems and software procedures used to operate this website acquire, during their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols. Such information is not collected for the purpose of being associated with identified Data Subjects; however, by its very nature, it may allow users to be identified through processing and matching with data

held by third parties. This category includes IP addresses or domain names of the computers used by users connecting to the website, URI (Uniform Resource Identifier) addresses of requested resources, the time of the request, the method used to submit the request to the server, the size of the response file, the numerical code indicating the status of the server response (successful, error, etc.), and other parameters relating to the user's operating system and IT environment. These data are used solely to obtain anonymous statistical information on website usage and to verify its proper operation and are deleted immediately after processing. The data may be used to establish liability in the event of alleged cybercrime against the website; save for this circumstance, web contact data are currently retained for no longer than seven days;

- **Data provided by the user:** the optional, explicit and voluntary submission of personal data by the user through the forms available on this website entails the subsequent acquisition of the data provided by the sender, as required to supply the requested service, including contact details provided for subscription to and delivery of the newsletter. Specific concise notices will progressively be included or displayed on the website pages dedicated to particular on-demand services;
- **Cookies and other tracking technologies:** for further information on the cookies used by this website, please refer to the Cookie Policy available on each website.

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

The purposes of processing, the relevant legal basis, the retention period and the nature of the provision of data are set out below:

a) ***browsing the website***;
b) ***completion of the contact form (or website chat) and sending communications to the Controller***;
c) ***downloading information materials available on the website***;
d) ***commercial and marketing communications***;
e) ***subscription to the newsletter service and delivery of periodic communications.***

**Legal basis**: processing for purpose a) is necessary for the pursuit of the legitimate interests of the Companies or third parties, provided that such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject requiring the protection of personal data, taking into account the Data Subject's reasonable expectations based on his or her relationship with the Data Controller. The processing is therefore lawful pursuant to Article 6(1)(f) and Recital 47 of the GDPR.
Processing for purposes b) and c) is necessary in order to take steps at the Data Subject's request prior to entering into a contract and/or for the performance of a contract. The processing is therefore lawful pursuant to Article 6(1)(b) of the GDPR.
Processing for purposes d) and e) is based on the Data Subject's consent pursuant to Article 6(1)(a) of the GDPR. For each purpose, processing will be carried out only where specific, freely given, informed and unambiguous consent has been obtained; such consent may be revoked at any time without affecting the lawfulness of processing carried out prior to its revocation.

**Retention periods**: personal data processed for purpose a) are retained for the duration of the browsing session (as regards browsing, please refer to the Cookie Policy). Personal data processed for purposes b) and c) are retained for 10 years from termination of the relationship, on any grounds whatsoever (without prejudice to any events interrupting or suspending the limitation period). Personal data processed for purposes based on consent are retained until consent is revoked and, in any event, for no longer than is necessary for the relevant purposes, without prejudice to the retention of information required to evidence consent and its revocation, within the limits permitted by applicable law.

**Nature of the provision of data**: the provision of data is mandatory insofar as it is necessary to perform contractual obligations (e.g., responding to requests for information). Except for browsing data, which are necessary to enable use of the website, where processing is based on legitimate interest, the provision of data is optional; if such data are not provided, your data will not be processed for that purpose. Where processing is based on consent, the provision of data is optional; if consent is not provided, your data will not be processed for that purpose.

## 5. Recipients or categories of recipients of the data

Personal data will not be disseminated. Personal data may, however, be disclosed to and processed by specifically authorised persons acting under the authority of Kirey Group pursuant to Article 29 of the GDPR and Article 2-quaterdecies of Italian Legislative Decree No. 101/2018 (including any duly appointed system administrators, a list of whom may be requested from Kirey Group), as well as by external parties processing the data as autonomous Data Controllers or as Data Processors pursuant to Article 28 of the GDPR, on the basis of specific instructions concerning the purposes and methods of processing.

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

The personal data collected and processed will under no circumstances be transferred outside the countries of the European Economic Area (EEA).

## 7. Data processing methods

Personal data will be collected and processed using manual, computerised and telematic tools and according to methods strictly related to the relevant purposes. No automated decision-making processes are carried out for the purposes set out in this Policy.

## 8. Rights of Data Subjects

The Data Subject shall have the right, at any time, to request from the Companies access to his or her personal data (Article 15), rectification (Article 16) or erasure thereof (Article 17), or restriction of processing (Article 18). The Companies shall communicate to each recipient to whom the personal data have been disclosed any rectification, erasure or restriction of processing carried out (Article 19). The Companies shall inform the Data Subject of such recipients if so requested. Where applicable, the Data Subject shall have the right to revoke consent at any time, without affecting the lawfulness of processing based on consent before its revocation. The Data Subject shall also have the right to object to the processing of personal data, including processing based on legitimate interests.

The Data Subject may exercise his or her rights under Articles 15 to 22 of the GDPR by contacting each Company, sending an email to privacy@kireygroup.com or writing to the contact details set out in paragraph 2 of this Privacy Policy. Where the Data Subject considers that the processing of personal data infringes the GDPR, he or she shall have the right to file a complaint with the competent Data Protection Authority, in particular in the Member State of his or her habitual residence or place of work, or in the place of the alleged infringement (the contact details of the Italian Data Protection Authority are available at: https://www.garanteprivacy.it/home/footer/contatti), or to seek an effective judicial remedy before the competent courts.

## 9. Further information

The Data Controller reserves the right, at its sole discretion and at any time, to amend, update, supplement or remove portions of this Privacy Policy. To facilitate verification, the Policy will indicate the date of its latest update.

Latest update: **September 2026**

**Kirey S.r.l.**
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