

Policy concerning the processing of personal data pursuant to Art. 13 of Legislative Decree 196/2003 and to Articles 12, 13 and 14 of GDPR EU/2016/679 (hereinafter referred to as "Rules concerning the processing of personal data")

In accordance with the rules on the processing of personal data, please be informed that your personal data, including any bank and payment details, "Personal Data" that you have disclosed us on the conclusion of contracts for the services of the Data Controller will be processed by the Data Controller and by the persons shown in the updated list of data processors and persons in charge of processing held at the registered office of the Data Controller.

1. Processing purpose

Your personal data are processed:

- A. Without your express consent (Article 24, subparas. a), b), c) of the Privacy Code and Art. 6, subparas. b), e) of GDPR EU/2016/679), for the following service purposes:
- Entering into the contracts for the services of the Data Controller;
 - fulfilling the pre-contractual, contractual and tax obligations deriving from relations in place with you;
 - fulfilling the obligations established by law, by a regulation, by community legislation or by an order of the Authority (such as for anti-money laundering);
 - exercising the rights of the Data Controller, such as the right to defense in court, and in any case in the case of legitimate interest of the Data Controller.
- B. Only subject to your specific and distinct consent (Articles 23 and 130 of the Privacy Code and Article 7 of GDPR EU/2016/679), your data will be used for the following Marketing Purposes:
- send you via e-mail, mail and/or SMS and/or telephone contacts, newsletters, commercial communications and/or advertising material on products or services offered by the Data Controller and detection of your degree of satisfaction on the quality of services;
 - sending via e-mail, mail and/or SMS and/or telephone contacts, commercial and/or promotional communications of third parties (for example, business partners, insurance companies, other companies connected to Atar Naive S.r.l.).

Please note that if you were already a customer, we may continue to send you commercial communications relating to services and products of the Data Controller similar to those you have already used, unless you express your disagreement with the receipt of such communications.

2. Processing methods

The processing of your personal data is carried out by means of the operations set forth in Art. 4 of the Privacy Code and Art. 4 no. 2) of GDPR EU/2016/679 and more precisely: collection, registration, organization, storage, consultation, processing, amendment, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. Your personal data are subjected to both paper and electronic and/or automated processing.

The Data Controller will process your personal data for the time necessary to fulfill

the aforementioned purposes and in any case for no more than 10 years from the termination of the Service Purpose relationship and for no more than 2 years from the collection of data for Marketing Purposes.

3. Access to data

Your data may be made accessible for the purposes referred to in Art. 1A) and 1B):

- to employees and collaborators of the Data Controller or of the companies connected to Atar Naive S.r.l. located in Italy, in their capacity as assignees and/or internal managers of the processing and/or system administrators;
- to third-party companies or other entities that carry out outsourced activities on behalf of the Data Controller, in their capacity as external data controllers.

4. Data communication

Without the need for express consent (pursuant to Article 24, subpara. a), b), d) of the Privacy Code and Art. 6, subparas. b) and c) of GDPR EU/2016/679), the Data Controller may communicate your data for the purposes referred to in Art. 1.A) to Supervisory Bodies (such as IVASS), Judicial Authorities, to insurance companies for the provision of insurance services, as well as to those subjects to whom the communication is mandatory by law for the accomplishment of said purposes. These subjects will process the data in their capacity as independent data controllers.

Your data will not be disseminated in any case.

5. Data transfer

Your personal data are stored on Atar Naive S.r.l. server located in Via Trento 24, 16018 Mignanego, Genoa (Italy) and, in any case, within the European Union.

6. Nature of providing data and consequences of refusing to answer

The provision of data for the purposes referred to in Art. 1.A) is mandatory. In their absence, we cannot guarantee the services of Art. 1.A).

The provision of data for the purposes referred to in Art. 1.B) is optional. You can therefore decide not to give any data or to subsequently deny the possibility of processing data already provided: in this case, you will not be able to receive newsletters, commercial communications and advertising material concerning the Services offered by the Data Controller. However, you will continue to be entitled to the Services referred to in Art. 1.A).

7. Rights of the Data Subject

In your capacity as a Data Subject, you have the rights set forth in Art. 7 of the Privacy Code and Art. 15 of GDPR EU 2016/679 and precisely the rights of:

- i. obtaining confirmation of the existence or not of personal data concerning you, even if not yet registered, and their communication in an intelligible form;
- ii. obtaining the indication: a) of the origin of personal data; b) of the purposes and methods of the processing; c) of the logic applied in case of processing carried

out with the aid of electronic instruments; d) of the identification details of the Data Controller, the managers and the representative designated pursuant to Art. 5, paragraph 2 of the Privacy Code and Art. 3, paragraph 1, of GDPR EU/2016/679; e) of the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of them in their capacity as designated representative in the territory of the State, of managers or agents;

iii. Obtaining: a) the updating, rectification or, where relevant, integration of data; b) the cancellation, transformation into anonymous form or blocking of data processed in violation of law, including those that are not required to be kept in relation to the purposes for which the data were collected or subsequently processed; c) the certification that the transactions referred to in sections (a) and (b) have been made aware, including their content, of those to whom the data have been communicated or disclosed, except where such fulfillment is impossible or involves the use of means manifestly disproportionate to the protected right;

iv. objecting, in whole or in part: a) for legitimate reasons, to the processing of personal data concerning you, even if pertinent to the purpose of the collection; b) to the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication, through the use of automated call systems without the intervention of an operator by e-mail and/or through traditional marketing methods by telephone and/or paper mail. It should be noted that the right of opposition of the Data Subject, set out in section b) above, for direct marketing purposes through automated methods extends to traditional ones and that in any case the possibility remains for the Data Subject to exercise the right to object even only partially. Therefore, the Data Subject can decide to receive only communications using traditional methods or only automated communications or none of the two types of communication.

Where applicable, it also has the rights referred to in Articles 16-21 of GDPR EU/2016/679 (Right of rectification, right to be forgotten, right to processing limitation, right to data portability, right of opposition), as well as the right to complain to the Guarantor Authority.

8. How to exercise the rights

You can exercise your rights at any time by sending:

- a registered letter with acknowledgment of receipt to Atar Naive S.r.l. Via Trento 24, 16018 Mignanego, Genoa (Italy) or an e-mail to info@atarnaive.com.

9. Data Controller, manager and agents

The Data Controller is Atar Naive S.r.l. with registered office in Via Trento, 24 16018 - Mignanego (GE) - Italy.