

POLICY ON TRACKING VIA PIXELS IN NEWSLETTERS

This policy explains how tracking pixels are used in the newsletters sent by Mozzanica & Mozzanica S.r.l.

Tracking pixels may make it possible to detect whether a newsletter has been opened and to process statistical information on the interaction with the message. The processing is described in a transparent manner so that each recipient can make a free and informed choice, give or deny consent and change it later.

The subscription and receipt of the newsletter must not be subject to consent to individual tracking, unless this is justified by a different documented and verified legal basis. The choices of the data subject can be managed from the panel accessible from the "Manage your subscription" link, present in the footer of the newsletter.

1. DATA CONTROLLER

The Data Controller is Mozzanica & Mozzanica S.r.l. (hereinafter "**Mozzanica**"), with registered office in Osnago (LC) – 23807, Via Martiri della Liberazione, 12, which is responsible to you for the legitimate and correct processing of your Data.

2. DATA PROCESSED

The following data may be processed as part of the newsletter tracking, within the limits of the actual technical configuration and the consent given, where necessary:

- The recipient's email address, which is in the reports and/or associated with the opening event;
- Date and time of opening the newsletter;
- Total number of openings of the single newsletter;
- Total number of clicks recorded on newsletter links.

3. PURPOSE OF THE PROCESSING

Tracking data may be used to:

- To measure the opening of the newsletter and, where applicable, clicks on links individually;
- To develop statistics and reports on the performance of newsletters;

- #### 4. LEGAL BASIS OF THE PROCESSING

5. PROCESSING METHODS

For the management and sending of newsletters, as well as for the detection of openings and clicks, the Data Controller may make use of providers of email services, newsletter platforms, hosting services, cloud infrastructures, analysis tools and connection monitoring systems. These providers may process personal data exclusively on behalf of the Data Controller and according to the instructions given by the latter, as data processors pursuant to Article 28 of Regulation (EU) 2016/679, where applicable.

Personal data may be processed by providers established in the European Economic Area. If, for technical or organisational reasons, the data is transferred or made accessible to entities located outside the European Economic Area, the transfer will be carried out in compliance with the conditions set out in Chapter V of Regulation (EU) 2016/679 and on the basis of an adequacy decision of the European Commission, where available, or through the adoption of appropriate safeguards, such as standard contractual clauses adopted by the European Commission, possibly supplemented by additional security measures where necessary.

The updated list of suppliers, the countries to which the data may be transferred and the guarantees applied is available upon request by the data subject by writing to the email addresses indicated in paragraph 9. The data subject may also request a copy of the guarantees adopted for the transfer, within the limits provided for by the applicable legislation.

6. HOW CONSENT IS COLLECTED

Consent to tracking is optional. Failure to select your choice does not prevent you from receiving newsletters, except as may be indicated separately and verified in the Privacy Policy.

The choice on tracking is separate from the choice to receive the newsletter. To stop receiving the newsletter, use the "Unsubscribe" command instead.

The Data Controller retains proof of consent, the date and time of its collection, the text of the information displayed, the choice made and subsequent amendments or revocations, for the period necessary to demonstrate the compliance of the processing and to manage any disputes.

7. REVOCATION AND DEACTIVATION

You can revoke your consent to the tracking of openings and clicks at any time via the "Manage your subscription" panel, which can be reached from the link in the footer of the newsletter. The revocation of tracking does not imply unsubscription from the newsletter: the data subject can continue to receive communications without the relevant individual tracking.

Unsubscribing from the newsletter is a separate choice and stops sending newsletters in the manner indicated in the relevant command. Revoking tracking and unsubscribing must be simple, free, visible and not penalizing. The choices of the data subject are recorded by the Data Controller to demonstrate compliance and manage any requests or disputes.

8. DATA RETENTION TIMES

The tracking data associated with each message sent are stored for the period strictly necessary for the purposes indicated in paragraph 3 and, in any case, no longer than 365 (three hundred

and sixty-five) days, according to the configuration declared by the Data Controller. After this period, the data are deleted or made non-referable to the data subject, unless they must be kept for a further period in the presence of a legal obligation, to exercise or defend a right or to manage a dispute, according to the Data Controller's general retention policy.

Evidence of consent, changes in preferences and withdrawals may be retained for as long as necessary to demonstrate compliance with the law and to handle any disputes, in compliance with the General Retention Policy and the principles of minimization and limitation of storage.

9. RIGHTS OF THE DATA SUBJECT

Data subjects may exercise the rights recognised by Articles 15 et seq. of Regulation (EU) 2016/679 (GDPR). They have the right to obtain from the Data Controller access to their personal data, the rectification or erasure of the same, as well as the limitation of the processing concerning them or to object to the same. The right to data portability, where applicable, is also recognised, as well as the right to lodge a complaint with the Data Protection Authority.

To exercise your rights or request information on tracking, you can send an email to privacy@mozzanica.eu address and/or PEC address mozzanica@legalmail.it.

The data subject also has the right to lodge a complaint with the Guarantor for the protection of personal data, according to the procedures published on the Authority's website: www.gpdp.it.