

Privacy e Cookie Policy

This Privacy and Cookie Policy is intended to describe the purposes and methods by which **COIMA SGR S.p.A.**, data controller ("**Company**" or "**Controller**"), collects and processes personal data relating to the user ("**User**") who interacts with the website www.palazzopellico.coima.com and its extensions ("**Site**") and with the various services offered by the same, as well as how the Company uses cookies and/or other tracking tools on the Site.

The information contained in this Privacy and Cookie Policy is provided pursuant to art. 13 of EU Regulation no. 679 of 27 April 2016 ("**Regulation**" or "**GDPR**"), as well as the Provisions issued by the Authority for the protection of personal data and Guidelines of the European authorities.

The information regarding data processing is provided only for the Site and for the processing carried out by the Company and does not extend to processing carried out by third parties through other sites that may be consulted by the User via links. With respect to said additional processing, the Company does not assume any responsibility, and the User must refer to the individual privacy policies of third-party sites.

1. Data controller

COIMA SGR S.p.A., with registered office in Milan (Italy), Piazza Gae Aulenti 12, 20154.

2. Method of data processing

The Company processes the User's data by adopting all appropriate security measures aimed at preventing unauthorized access, as well as the unauthorized disclosure, modification or destruction of data. Processing is carried out with both manual and computerized and/or telematic tools, with organizational methods and with logic strictly related and limited to the purposes indicated.

3. Purpose of data processing and legal basis of processing

The Company, through the Site, may process the User's data for the following purposes:

- **Contact the Company.** The User has the possibility to contact the Company to request information through the contact details indicated on the Site. In this regard, the personal data provided voluntarily by the User (e.g. e-mail address, telephone number, and/or other information spontaneously provided by the User) will be processed by the Company to take charge of, correctly manage and respond to the communications and/or requests received from the User. Requests for information sent to different companies (possibly indicated on the Site) and other than the Data Controller will be processed on the basis of the respective privacy policies made available by the latter. The legal basis of the processing is represented by the execution of the service expressly requested by the User and any refusal to provide personal data makes it impossible to manage and respond to the communication or request for information (art. 6 (1)(b) GDPR).

- **Pursuit of the legitimate interests of the Company and/or third parties.** The User's data may also be used to exercise the rights and legitimate interests of the Company and/or third parties, for example the management of complaints and disputes, the prevention of fraud and/or illegal activities. In these cases, even if the provision of the User's personal data is not mandatory, it is still necessary as such data is strictly connected and instrumental to the pursuit of such legitimate interests, which do not prevail over the fundamental rights and freedoms of the User and any refusal to provide them could make it impossible to provide the requested services (e.g. request information from the Company) (art. 6 (1)(f) GDPR).
- **Fulfill legal obligations and/or applicable obligations.** The Company may also use the personal data provided by the User or otherwise acquired during the User's interaction with the Site for purposes related to the execution of legal obligations, regulations, national and community regulations as well as deriving from provisions issued by authorities legitimated to do so by law, which represent the legal basis of the processing (art. 6 (1)(c) GDPR).

4. Categories of data subject to processing

The Company receives and collects, through the Site, information relating to the User who visits the pages of the Site and who uses the web services available on the same. In particular, the Company acquires and processes the following information.

4.1 Data collected through navigation and cookies

When the User visits the Site, the latter collects some data relating to navigation such as, for example, the language chosen by the User and the IP address of the User (so-called "navigation data"). The Company uses this data for purposes strictly related to the functioning of the Site. The navigation data could also be used to ascertain responsibility in the event of any computer crimes against the Site. In relation to the collection of User data through cookies and similar technologies, please visit the Cookie Policy (section 8).

4.2 Data provided voluntarily by the User

The Company limits the collection of information provided voluntarily by the User to that necessary for the pursuit of the purposes illustrated in the previous section 3. Furthermore, the Company may collect and process additional personal data, where such data is provided voluntarily by the User in the context of the services offered by the Site, for example in the event that the User contacts the Company for any reports, exercise their rights on the processing of personal data, etc. Such data will be processed by the Company solely for the purposes strictly related to the User's request. Failure to provide such data may make it impossible to obtain the requested servicecomunicazioni e/o richieste ricevute dall'Utente. Richieste di informazioni inviate a società diverse (eventualmente indicate sul Sito) e diverse dal Titolare saranno trattate sulla base delle rispettive privacy policy messe a disposizione da quest'ultime. La base giuridica del trattamento è rappresentata dall'esecuzione del servizio espressamente richiesto dall'Utente e l'eventuale rifiuto di fornire i dati personali comporta l'impossibilità di gestire e riscontrare la comunicazione o la richiesta di informazioni (art. 6 (1)(b) GDPR).

5. Communication of data to third parties

The data provided by the User as well as those collected by the Site in the context of the related services (e.g. IP address) will not be disclosed and may be communicated, for the purposes and methods illustrated in this Privacy and Cookie Policy, to the categories of subjects indicated below:

- companies of the COIMA platform, for organizational purposes, internal control, for the pursuit of the legitimate interests of the Company and/or third parties, and for the purposes of performing the services/requests expressly advanced by the User;
- companies, collaborators, consultants or freelancers that the Company uses to carry out technical or organizational tasks (such as IT service providers), or with which the Company collaborates, including other COIMA Companies, for the purposes of providing and operating its services, or for any communication activities;
- people, companies or professional firms that provide assistance and consultancy to the Company, with particular but not exclusive reference to accounting, administrative, legal, tax and financial matters;
- subjects whose right to access the data is recognized by provisions of law or by orders of the authorities.

The subjects belonging to the categories indicated above will use the data as independent data controllers pursuant to the law or as data processing managers duly appointed by the Company.

If the User writes directly to the press addresses of the various companies implementing the project, other than the Data Controller, they will process the data as independent data controllers exclusively to provide feedback to requests received via email.

The list of subjects to whom the data is or may be communicated can be requested from the Company by contacting the addresses indicated in the section "User Rights and Contacts".

6. Data retention

The data is processed for the time necessary to carry out the activities indicated in the previous section 3, and is deleted when the purposes for which it was collected and processed cease to exist.

In particular, the Company will provide feedback to requests received via email, without further processing the personal data provided, except for the need to retain the data for longer periods if necessary for the timely execution of the user's request.

The information collected through cookies will be retained for the times indicated in each table in section 8 below.

7. User rights and contacts

The User may exercise, in the cases expressly provided for by law and where applicable, the rights provided for by the Regulation. In particular, the User has the right to:

- obtain confirmation that his/her personal data is being processed and, if so, to ask the data controller for access to the information relating to the processing itself (e.g. purposes, categories of data processed, recipients or categories of recipients of the data, the retention period, etc.);
- ask for the rectification of inaccurate or incomplete data;
- ask the data controller to delete the data (e.g. if the personal data are no longer necessary with respect to the purposes for which they were collected, in the event of revocation of the consent on which the processing is based, etc.);
- request the limitation of processing (e.g. in the event of a dispute by the User on the accuracy of the data; if the processing is unlawful and the User opposes the deletion of personal data; if the data is necessary for the exercise or defense in court of a right of the User, even if the owner no longer needs it; in the event of exercising the right to object, for the time necessary to verify the existence of legitimate reasons);
- receive the personal data concerning him/her in a commonly used and machine-readable format (e.g. pdf) and transmit them to another owner, or obtain direct transmission from one owner to another, if technically feasible (so-called data portability).
- The User also has the right to object in whole or in part, for legitimate reasons, to the processing of personal data concerning him/her.

These rights can be exercised directly by sending a communication via email to the following address coimares-privacy@coima.com.

Finally, if you believe that the processing of the data provided violates the legislation on the protection of personal data, you have the right to lodge a complaint with the Authority for the protection of personal data (www.garanteprivacy.it).

8. Data collection through Cookies

8.1 What are cookies

In general, cookies are small text files that the sites visited by the user send to the terminal used by the user to access the Internet (usually the browser), where they are stored before being re-transmitted to the same sites on the next visit by the same user. Each cookie is unique in relation to the browser and device used to access the Site.

Cookies can be installed by the owner or manager of the site that the user is visiting (so-called "first-party cookies") or by other providers (so-called "third-party cookies").

Cookies can be stored on the user's device permanently, in this case, once the browser is closed they are not removed but remain until a preset expiry date or until deletion by the User (so-called "permanent cookies") or be automatically deleted every time the navigation of the Site is abandoned or the browser is closed (so-called "session cookies").

Cookies can be:

- **Technical:** these cookies are necessary for the correct functioning of a site or are useful for storing information about users during subsequent visits to the site. Consequently, they do not require the User's consent;
- **Analytical:** these cookies can be used, among other things, to evaluate the effectiveness of an information society service, for the design of a website or to help measure its "traffic", i.e. the number of visitors, possibly divided by geographic area, time slot of connection or other characteristics. The use of analytical cookies installed and managed directly by the first party for statistical purposes (which do not go beyond the boundaries of a mere statistical count) does not require the User's consent, as they are assimilated to technical cookies. However, where their use is carried out by third parties, in order for analytical cookies to be equated to technical cookies, it is essential to preclude the possibility that, through their use, the interested party can be directly identified (so-called single out). In other words, the User's consent will not be required if (i) the same cookie is referable not to one but to multiple devices, in such a way as to create reasonable uncertainty about the IT identity of the subject receiving it (e.g. by masking appropriate components of the IP address), (ii) such cookies are used solely to produce aggregate statistics and in relation to a single site or mobile application, and (iii) third parties refrain from combining analytical cookies, thus minimized, with other processing or from transmitting them to other third parties. Where, however, they are not assimilated to technical cookies, they require the User's consent;
- **Profiling:** these cookies are used to trace back to specific, identified or identifiable subjects, specific actions or recurring behavioral patterns in the use of the features offered on the sites in order to group the different profiles within homogeneous groups of different sizes, so that it is possible for the owner, among other things, also to modulate the provision of the service in an increasingly personalized way beyond what is strictly necessary for the provision of the service, as well as send advertising messages in line with the preferences expressed by the same user in the context of online browsing. These cookies require the User's consent in order to be used.

8.2 Cookies Used on the Site

The Site uses first-party cookies only for technical purposes as better illustrated below:

1. Elementor

The purpose is to be able to view the website in different languages, in this case in English. The data retention period is equal to the duration of the user's session.

8.3 Changing and managing cookie preferences

Most browsers (Internet Explorer, Firefox, Chrome, etc.) are configured to accept, manage and disable cookies through their settings. Through the browser settings you can block or

delete cookies received from the Site or any other site, changing the browser settings through the appropriate function of the browser itself.

The settings for managing cookie preferences are usually found in the browser menu under "options" or "preferences".

Below are links to the instructions for the following browsers:

Internet Explorer - <http://windows.microsoft.com/en-gb/windows-vista/block-or-allow-cookies>

Chrome - <https://support.google.com/chrome/answer/95647>

Firefox - <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

Opera - <http://www.opera.com/help/tutorials/security/privacy/>

Safari - <http://support.apple.com/kb/PH17191>

Alternatively, you can manage your choices regarding cookies through the sites www.youronlinechoices.org or www.aboutcookies.org.

Please note that disabling all cookies, even strictly necessary cookies, could cause problems when browsing the Site and prevent the use of some of the Site's features.

9. Use of Other Websites

It is recommended that you read the privacy and cookie policy of the websites you access through the links on the Site. Please note that cookie preferences on this Site will not be active on the websites of other companies.

10. Transfer to Non-EU Countries

Unless strictly necessary for the purposes indicated in this Privacy and Cookie Policy, the Company will not transfer the User's personal data to entities established outside the European Economic Area ("EEA"). Where data is transferred outside the EEA, the Company will take all necessary measures to ensure compliance with the provisions of Chapter V of the Regulation.

11. Changes to the Privacy and Cookie Policy

The Company reserves the right to make changes to this Privacy and Cookie Policy at any time, giving notice by publishing on the Site. We invite the User to check the Site for such updates. If the changes are particularly significant and/or have a significant impact on the User's rights, the Company may also communicate them to the User through a different method (for example, sending an email).

Privacy and Cookie Policy updated on 08.05.2025