

Introduction

When it comes to your Personal Data (“Personal Data”), Ghibli & Wirbel, (“G&W”), as well as our employees, contractors and service providers are committed to providing you with transparency and choice. Ghibli & Wirbel is committed to providing reliable and trustworthy information to our customers using a variety of means, which are supported by a comprehensive privacy program. We aim to process Personal Data in accordance with applicable legislation, while taking into account and transparently balancing the relevant interests of our customers, ourselves and other stakeholders.

This Privacy Statement (“Statement”) provides an overview of how Ghibli & Wirbel, via our websites and services, handle privacy, and how we protect your Personal Data.

This Privacy Statement applies to the Ghibli & Wirbel websites, products and services that link to or reference this Statement and describes how we handle Personal Data and the choices available to you regarding collection, process, access, and how to update, correct and delete your Personal Data. Additional information on our Personal Data practices may be provided in offer descriptions, contractual terms, supplemental privacy statements, or notices provided prior to or at the time of data collection.

If the user is in the European Economic Area, and unless otherwise agreed, the Data Controller of his/her Personal Data is DGR Srl, via Enrico Fermi, 43- 37136 Verona (VR), in the capacity of Data Controller of the personal data of Ghibli & Wirbel SpA, as the pro tempore legal representative, with its principal place of business in Via Circonvallazione 5 - 27020 Dorno, Italy.

What This Statement Covers

This Statement describes the following general aspects of our collection and processing of Personal Data concerning you. Please refer to our complementary product and service privacy notices for additional detail specific to those products and services.

- What Personal Data we collect;
- How Personal Data is used and for what purposes;
- When and why Personal Data is transferred to third parties;
- How we maintain the accuracy, integrity and security of your Personal Data;
- How your Personal data is retained and destroyed;
- What individual rights available to you as it pertains to your Personal Data;
- Who you can contact if you have any questions regarding the use of your Personal Data.

Personal Data We Collect

Purpose, legal basis and lawfulness of processing

Pursuant to article 13 of EU Regulation 2016/679 (hereafter "GDPR"), DGR Srl, legal representative of Ghibli & Wirbel SpA, Dorno, (hereinafter "DGR" or the "Controller") - with registered office in Via Enrico Fermi, 43 Verona - Italy, in its capacity as Data Controller of personal data, in the person of its pro tempore legal representative, informs that the personal data supplied by you will be processed by DGR itself through manual processing or electronic or automated tools, computerised or telematic, with logics strictly related to the purposes listed below and, in any case, in order to guarantee the security and confidentiality of the data.

When you visit and use our websites, we may collect data or ask you to provide certain data, including Personal Data, about you as you use our websites, products and services and interact with us, for the purpose of helping us manage our relationship with you. "Personal Data" is any data relating to an identified or identifiable individual, and may include name, address, email address, phone number, login (account number, password), marketing preferences, social media account, or payment card number. If we link other data with your Personal Data, we will treat that linked data as Personal Data.

This data may include:

- Contact details, such as name, mailing address, email address and phone number;
- Shipping and billing data;
- Your transaction history;
- Data that the user provides to receive technical assistance or during customer service interactions;
- Data related to personal training, diplomas acquired and related assessment and personal interests.

It is the user's responsibility to ensure that, when communicating with Ghibli & Wirbel the Personal Data of persons other than the user - such as their contacts, users or other third parties - the current data privacy and data security laws are observed; including the obligation to inform users and third parties that you provide Personal Data to Ghibli & Wirbel, informing them on how it will be transferred, used or processed, ensuring the existence of the appropriate authorisations and legal guarantees required for such disclosure, transfer and processing. If you choose to provide Ghibli & Wirbel with the Personal Data of a third party (such as name, e-mail address and telephone number), you declare that you have the Third Party's authorisation to do so.

Examples include submitting references or sending work references. The user also acknowledges that when we interact with these third parties, whose Personal Data is shared with us, it is our duty to inform them that we have obtained their Personal Data from the user. Where applicable, third parties may opt out from receiving any future communication as indicated in the "Contact Us" section of this Notice. If you believe that one of your contacts has provided us with your Personal Data and you wish to request its removal from our database, please contact us at privacygdpr@ghibliwirbel.com.

Personal data is processed by the Controller pursuant to article 6 of the GDPR.

The following are the specific purposes of processing and the related legal bases:

Purpose of processing	Legal basis of processing
Conclusion of contracts for the services of the Controller	Execution of a contract or execution of pre-contractual measures
Customer list creation	Execution of a contract or execution of pre-contractual measures
Provision of technical service	Execution of a contract or execution of pre-contractual measures
Supplier list creation	Execution of a contract or execution of pre-contractual measures
B2B area list creation	Execution of a contract or execution of pre-contractual measures
Database Curricula Vitae	Management of recruitment or personnel selection data

Nature of the conferment and consequences of refusal

The provision of data is mandatory for the fulfilment of legal and / or contractual obligations.

Therefore, any refusal to provide the mandatory data will result in the objective impossibility to fulfil the processing purposes referred to in this Notice (paragraph "Purpose, legal basis and lawfulness of processing").

Categories of recipients of personal data

The personal data provided and that relating to the execution of the contractual relationship may be disclosed to third parties belonging to the following categories:

- a) companies in the group to which the Controller belongs (parent companies, subsidiaries, affiliated companies), employees or collaborators for any reason whatsoever of the Controller or of companies of the group to which the Controller belongs;
- b) public or private entities, natural or legal persons, which the Controller uses for the performance of the activities instrumental to the fulfilment of the aforementioned purpose or to which the Data Controller is required to communicate the Data, pursuant to legal or contractual obligations.

How We Process Your Personal Data

In order to fulfil our contract agreed with the user or conclude a contract with him at his request, in order to:

- Create your own Ghibli & Wirbel Account (access for MyG&W, MyWirbel), when necessary to access communications and services;
- Verify the identity and right to user services, when contacting us or accessing our services;
- Update the user on the status of his orders;
- Manage the subscriptions of the user; and provide the user with technical assistance and customer support.
- Manage the data in his Curriculum Vitae for internal personnel selection surveys

On the basis of legal obligations we are required, for example, to hold records for tax purposes or to respond to urgent orders and provide information to public authorities.

We will only deal with special categories of Personal Data ("Sensitive Personal Data") relating to the user for the specific purposes mentioned above, because:

1. The user has provided us with his explicit consent to process such data; or
2. The processing is necessary to fulfil our obligations regarding employment, assistance and social security;
3. The processing is necessary to claim, exercise or defend a legal claim; or
4. The user has made the data public.

On the basis of our legitimate interest, we and our third-party partners, may combine the data we collect from you over time from our websites, products and services with data obtained from other sources. We combine your data with other sources to improve user experience on our websites and services we provide. In some instances, Ghibli & Wirbel and the third-parties we engage may automatically collect data through cookies, web logs and other similar applications. This data is used to better understand and improve the usability, performance, and effectiveness of our websites, products and services to help tailor content or offers for you. Please reference the "Tracking Technologies, Cookies & Do-Not-Track" section below for more information.

On the basis of legitimate interest, we process Personal Data for network and information security purposes. Pursuant to Recital (49) of the EU General Data Protection Regulation ("GDPR"), organizations have a recognized legitimate interest in collecting and processing Personal Data to the extent strictly necessary and proportionate for the purposes of ensuring network and information security. According to said Recital (49), network and information security means the ability of a network or of an information system to resist

events, attacks or unlawful or malicious actions that could compromise the availability, authenticity, integrity and confidentiality of stored or transmitted data, or the security of the related services offered by, or accessible via those networks and systems.

If the user believes that his Personal Data has been improperly collected or is unduly processed by Ghibli & Wirbel for such purposes, you may refer to the "Your Rights" and "Contact Us" sections below. Please note that if it is ascertained that the User's Personal Data is processed by Ghibli & Wirbel as necessary for the detection, blocking or mitigation of incriminated malware, in line with Article 21 (1) of the GDPR, requests for objections, corrections or cancellations can be rejected. Our main legitimate interests are to protect our organisation and our customers from cyber threats, and therefore our interest may be waived by objections, corrections or requests for cancellation by the user, until the adoption of the necessary measures to dissociate the Personal Data of the user from any identified malware can be demonstrated.

Tracking Technologies, Cookies & Do-Not-Track

Cookies

A cookie is a commonly used automated data collection tool. Cookies are small text files that are placed on your computer or device by websites that you visit or HTML-formatted emails you open, to make websites work, or work more efficiently. We and our partners may use cookies, web beacons, pixel tags, scripts or other similar technologies on our websites or emails to:

- Ensure the proper functioning of our websites and the proper delivery of legitimate electronic communications;
- Tailor information presented to you based on your browsing preferences, such as language and geographical region;
- Collect statistics regarding your website usage;
- Provide us with business and marketing information; and
- In some cases, to enable a third-party to deliver future advertising for our products and services to you when you visit certain websites owned by third-parties.

We use different kinds of cookies:

- Essential cookies are necessary to provide you with services and features available through our websites. Without these cookies, services you may need, such as shopping carts or e-billing, cannot be provided.
- Analytics or customization cookies collect data that is either used in aggregate form to help us understand how the website is being used or how effective our marketing campaigns are, or to help us customize the website for you.
- Advertising cookies and tracking scripts are used to make advertising messages more relevant to you. They perform functions like preventing the same ad from continuously reappearing, ensuring that ads are properly delivered and, in some cases, featuring ads based on your interests. If your website includes a cookie management tool, you will find a hover button at the bottom of your screen.

If you do not wish to receive cookies you may be able to refuse them by not agreeing to the use of them upon entering the website. If you do so, we may be unable to offer you some of our functionalities, services or support. If you have previously visited our websites, you may also have to delete any existing cookies from your browser.

We gather certain data automatically and store it in log files. This data may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We may combine this log data with other data we collect about you. We do this to improve services we offer you, to improve marketing, analytics, or site functionality.

We use local storage, such as HTML5, to store content data and preferences. Third-parties with whom we partner to provide certain features on our website or to display advertising based upon your web browsing

activity also use HTML5 to collect and store data. Various browsers may offer their own management tools for removing HTML5 content.

Do-Not-Track

There are different ways you can prevent tracking of your online activity. One of them is setting a preference in your browser that alerts websites you visit that you do not want them to collect certain data about you. This is referred to as a Do-Not-Track (“DNT”) signal. Please note that our websites may not recognize or act in response to DNT signals from web browsers. There is currently no universally-accepted standard for what a company should do when a DNT signal is detected. In the event a final standard is established, we will assess how to appropriately respond to these signals. For more detailed information about cookies, Do-Not-Track and other tracking technologies, please visit www.allaboutcookies.org and <https://allaboutdnt.com>.

How We Disclose Your Personal Data

We do not sell, lease, rent or give away your Personal Data. We only disclose your Personal Data as described below, within Ghibli & Wirbel, with our partners, with service providers that process data on our behalf and with public authorities, as required by applicable law. Processing is only undertaken for the purposes described in this Statement and the relevant product and service privacy notices. If we disclose your Personal Data, we require its recipients to comply with adequate privacy and confidentiality requirements, and security standards.

Partners

We may provide your Personal Data to our partners for the purpose of allowing them to conduct Ghibli & Wirbel business. Our partners go through our third-party risk management and assessment process and only after that are they authorized to promote and sell our products and services.

All the subjects belonging to the categories to which the data may be communicated will use it as "Data Processors" specifically appointed by DGR, pursuant to art. 28 of the GDPR or autonomous "Data Controllers".

The data will also be processed by Privacy Delegates, as well as by persons specifically authorised by the Data Controller for the processing, pursuant to the GDPR.

The personal data processed by G&W is not subject to disclosure.

Service Providers Processing Data on Our Behalf

We may use contractors and service providers to process your Personal Data on our behalf for the purposes described in this Statement and the relevant product and service privacy notices accessible below. We contractually require service providers to keep data secure and confidential and we do not allow our data processors to disclose your Personal Data to others without our authorization, or to use it for their own purposes. However, if you have an independent relationship with these service providers their privacy statements will apply to such relationships.

Public Authorities

In certain instances, it may be necessary for Ghibli & Wirbel to disclose your Personal Data to public authorities or as otherwise required by applicable law. No Personal Data will be disclosed to any public authority except in response to:

- A subpoena, warrant or other process issued by a court or other public authority of competent jurisdiction;
- A legal process having the same consequence as a court-issued request for data, in that if Ghibli & Wirbel were to refuse to provide such data, it would be in breach of local law, and it or its officers, executives or employees would be subject to liability for failing to honor such legal process;
- Where such disclosure is necessary for Ghibli & Wirbel to enforce its legal rights pursuant to applicable law;
- A request for data with the purpose of identifying and/or preventing credit card fraud; or

- Where such disclosure of Personal Data is necessary to prevent or lessen a serious and imminent threat of bodily or other significant harm to the data subject or other individuals potentially concerned.

How We Protect Your Personal Data

Safeguards

We take reasonable and appropriate administrative, technical, organizational, and physical security and risk management measures in accordance with applicable laws to ensure that your Personal Data is adequately protected against accidental or unlawful destruction, damage, loss or alteration, unauthorized or unlawful access, disclosure or misuse, and all other unlawful forms of processing of your Personal Data in our possession.

Securing Personal Data is an important aspect of protecting privacy. Our security organization applies policies, standards and supporting security controls at the level appropriate to the risk level and the services provided. We pay specific attention to the protection of Personal Data and the risks associated with processing this data.

These measures include:

Technology Safeguards

We use network and information security technologies such as anti-virus and other protection software, encryption, intrusion detection and data loss prevention, and we monitor our systems and data centers to ensure that they comply with our security policies.

Personal Data Breaches

Ghibli & Wirbel takes every reasonable measure to prevent Personal Data breaches. When these do occur, we have a process in place to take swift action within our responsibilities. These actions will be consistent with the role we have in relation to the products, services or processes affected by the breach. In all cases, we will work together with affected parties to minimize effects, to make all notifications and disclosures that are required by applicable law or otherwise warranted, and to take action to prevent future breaches. We systematically outline responsibilities in case of Personal Data breaches in our contracts, both with customers as well as with our vendors.

Links to Other Websites

Our websites may contain links to other websites, which are owned or operated by other companies. If you choose to visit any linked websites, we encourage you to review their privacy statements carefully, as they may differ from ours. We are not responsible for the content or privacy practices of websites that are owned by companies that are not within Ghibli & Wirbel S.p.A.. Our websites may also link to co-branded websites that are maintained by Ghibli & Wirbel and one or more of our business partners, who are collecting your Personal Data pursuant to their own privacy practices. We encourage you to read the privacy statements on any co-branded site to which you link for information on the privacy practices of that site.

Managing Your Personal Data

How long we retain or store your Personal Data

The data we collect from the user can be archived, with technical and organisational security measures appropriate to the risk applied to them, both internally and through third-party servers, respecting the standard required.

For how long do we hold or store a user's Personal Data

We will keep Personal Data in our systems for the longest of the following periods:

1. Until it is not necessary to maintain our current business relationship, or as necessary to provide to the user, products, services or information that one is entitled to or otherwise might reasonably expect to receive from us;
2. For the time necessary for the purpose for which we have collected or for which the user has provided it in accordance with any activity or process related to a product or service;
3. For any retention period necessary to comply with legal obligations, to resolve disputes and to ensure compliance with our agreements; or
4. The end of the period in which disputes or investigations may arise in connection with our business relationships or other interactions with you.

The personal data processed by DGR will be stored at the registered office of G&W for the time necessary to execute the contractual relationship, as well as for that prescribed by civil, fiscal and regulatory provisions. Subsequently, the data will be archived until the end of the limitation period required under law with reference to the individual rights that can be operated.

After these terms have elapsed, your data will be anonymised or deleted, unless it is necessary to keep it for other and different purposes provided under express provision of the law.

Below is the detail of the duration of the data retention period for the purposes described above, or the criteria used to determine this period:

Purpose	Category of personal data	Deadlines specified for deletion
Conclusion of contracts for the services of the Controller	<ul style="list-style-type: none"> o Name, address or other personal identification elements (Legal representative and details of contact persons) 	2 years after the closing of the contract except in cases of litigation that could extend these terms
Customer list creation	<ul style="list-style-type: none"> o Tax code o Name, address or other personal identification elements o Identity document (Identity card, Licence, Passport) 	2 years after the closing of the contract except in cases of litigation that could extend these terms
Provision of technical service	<ul style="list-style-type: none"> o Name, address or other personal identification elements 	2 years after the closing of the contract except in cases of litigation that could extend these terms
Supplier list creation	<ul style="list-style-type: none"> o Tax code o Name, address or other personal identification elements o Identity document (Identity card, Licence, Passport) 	2 years after the closing of the contract except in cases of litigation that could extend these terms
B2B area list creation	<ul style="list-style-type: none"> o Name, address or other personal identification elements o Email address 	2 years after the closing of the contract except in cases of litigation that could extend these terms
Database Curricula Vitae	<ul style="list-style-type: none"> o Tax code o Name, address or other personal identification elements o Identity document (Identity card, Licence, Passport) o Diplomas acquired and assessment o Personal interests if specified o References 	2 years after the closing of the contract except in cases of litigation that could extend these terms

For clarity in the event that DGR is a data controller that processes the user's personal data for our purposes, the user's personal data will be deleted or made anonymous when no longer necessary for the processing

purposes originally declared, or any another compatible purpose for which DGR can legitimately further process such data.

Furthermore, where DGR is a data controller that processes the user's Personal Data for the purposes and instructions of another data controller or processor, we will respect the time limits agreed with that other data controller or data processor unless we are otherwise obliged by the applicable laws and regulations to delete such data before or to keep it longer.

Automated decision-making process

To fulfil the processing purposes described above, no decision is taken based solely on the automated processing which produces legal effects that relate to those concerned or that significantly affects them in a similar way.

Non-EU transfers

To fulfil the processing purposes of treatment described above, the personal data provided may be transferred to the recipients indicated above in Italy and abroad.

In no case will your personal data be transferred outside of the European Union.

Your Privacy Rights

Pursuant to and for the purposes of the GDPR, the parties concerned are entitled to the following rights which they can exercise against DGR:

- a) the right to obtain from the Data Controller confirmation that the processing of personal data concerning you is in progress and, in this case, to obtain access to the personal data and information provided for by article 15 and in particular to that related to the processing purposes, to the categories of personal data in question, to the recipients or categories of recipients to whom the personal data has been or will be communicated, to the storage period, etc.;
- b) right to obtain, where inaccurate, the correction of personal data concerning you, as well as the integration of the same if considered incomplete in relation to the processing purposes (art. 16);
- c) right to delete data ("right to be forgotten"), where one of the cases referred to in art. 17 occurs;
- d) right to limit the processing, in the cases provided for by article 18;
- e) right to object to the processing pursuant to article 21; Choices concerning the receipt of communications
- f) to obtain from us the portability of Personal Data concerning him and which we process using automated tools on the basis of his consent or a contract that he has entered into with us; and
- g) in the European Economic Area, to file a privacy complaint with a supervisory authority if the user is dissatisfied with the way in which we have handled his Personal Data or any request for confidentiality or request that the user has raised with us.

Where your exercise of any of the rights above is dependent on DGR's action, we will abide by our legal obligation to take reasonable measures to ascertain your identity and the legitimacy of your request, and may ask you to disclose to us any information necessary for that purpose. We will respond to legitimate request within 1 (one) calendar month or 31 (thirty-one) calendar days (whichever is longer). In certain limited circumstances, we may need to extend our response period as permitted by applicable law. Pursuant to any such requests, we may retain certain data necessary to prevent fraud or future abuse or as otherwise required or permitted by law, including to comply with legal obligations we are subject to, as well as to establish, exercise and defend our legal claims.

Contact Us

To exercise any of your rights, or if you have any other questions or complaints about our use of your Personal Data and its privacy, write or call our Privacy Team at the most convenient location below:

Ghibli & Wirbel SpA

Via circonvallazione 5, 27020 Dorno - Italy

Call us: +39.0382.848811

Send us an e-mail: privacygdpr@ghibliwirbel.com

Changes to this Statement

We reserve the right to revise or modify this Statement. In addition, we may update this Privacy Statement to reflect changes to our data practices. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.



ghibli & wirbel S.p.A.
L'AMMINISTRATORE DELEGATO
DGR S.R.L.
Dr. Giuseppe Riello

Consent to the processing of personal data (EU Regulation 2016/679 - GDPR)

The undersigned _____

Born in _____ on _____ Tax
Code _____

Tel. _____

Mobile _____

e-mail _____

Declares to have received the information in which he was informed:

- of the identity of the Data Controller;
- the manner with which the processing takes place;
- the purposes of the processing for which the personal data is intended;
- the rights of the person concerned;
- the nature of the provision of data;
- all other indications provided in the notice.

I give my consent I do not give my consent

to the processing of personal data for the purpose of service in the manner and within the limits set out in the attached notice.

I give my consent I do not give my consent

to the processing of personal data for the purpose of marketing in the manner and within the limits set out in the attached notice.

I give my consent I do not give my consent

to the processing of personal data for the purpose of Reserved Area (MyGW - MyWirbel) in the manner and within the limits set out in the attached notice.

Place and Date

Name and Surname of the Concerned Party

Signature
