

#### PRIVACY POLICY

### Privacy policy for site users

The purpose of this page is to inform users of this website about the way in which it is managed with regard to the processing of their personal data, as required by Articles 13 and 14 of European Regulation no. 679/2016. This information notice also respects and complies with Recommendation no. 2/2001 that the European authorities for the protection of personal data, meeting in the Group established by art. 29 of Directive no. 95/46/EC, adopted on 17 May 2001 to identify certain minimum requirements for the collection of personal data online and, in particular, the methods, timing and nature of the information that data controllers must provide to users when they connect to web pages, regardless of the purpose of the connection. By consulting this site, data relating to identified or identifiable persons may be processed.

It is specified that the consent mechanisms will be self-evident, brief and easily understandable; if the original conditions for which consent was sought change (for example, if the purpose of the data processing changes), further consent will be required in accordance with European Regulation No. 679/2016.

Pursuant to Art. 26 of the European Regulation 2016/679 GDPR, Abitare Co. S.r.l., Abitare Servizi Immobiliari S.r.l., Riabitare Co S.r.l. and Abitare Commercial S.r.l., companies of the Abitare Group, following an internal agreement, recognise themselves and present themselves as co-owners of the processed data, in the light of joint means and purposes of processing.

# Types of data that can be acquired

# Navigation data

Our computer systems and the software procedures used to operate this website acquire, in the course of their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols.

The aforementioned information is not collected specifically in order to be associated with identified interested parties, but given its nature it could, through processing and association, allow users to be identified.

This category of data includes the IP addresses or domain names of the computers used by users connecting to the site, the URI (Uniform Resource Identifier) notation addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment.

This data is used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct operation. The data may be used to ascertain responsibility in the event of hypothetical computer crimes to the detriment of the site and may be shown to the Judicial Authorities, should the latter explicitly request it.



#### Data provided voluntarily by the user

The optional, explicit and voluntary sending of common personal data (such as personal details and contact data) on this site entails the subsequent acquisition of such data by the Data Controllers.

# In particular:

- 1. <u>If you are requesting general information about our services</u>, we will, with your consent in accordance with Art. 6 GDPR, collect and store your full name, email and telephone contact details in our database. Subject to your consent for further processing activities, you will only be contacted for the purpose of responding to your enquiries. Since real estate operations can take a long time, the storage of your data in our database will be for 5 years, after which your data will be deleted from all servers. You always have the right to withdraw your consent by contacting the data controller.
- 2. If you are enquiring about a specific construction site or project, we will, with your consent in accordance with Art. 6 GDPR, collect and store your full name, email and telephone contact details in our database. Unless you consent to further processing, you will be contacted only for the purpose of providing you with information regarding the worksite in which you have shown interest. The storage of your data in our databases will be for the duration of the existing relationship or for the duration of the worksite operations, after which your data will be deleted from all servers. You always have the right to withdraw your consent by contacting the data controller.
- 3. <u>If you are subscribing to our newsletter</u>, your e-mail address will be registered in our database and on the Mailup platform so that we can send you our press releases, promotions, information on the real estate sector and real estate market trends. You always have the right to revoke your consent and can delete your address from our newsletter by clicking on <u>unsubscribe</u>.
- 4. <u>If you are taking part in a questionnaire</u>, we may use your contact details (provided during compilation or already present in our CRM) to contact you and give feedback on your comments and evaluations.
- 5. <u>If you are submitting your application, we will,</u> with your consent, store the personal data contained in your CV for a period of two years in order to be able to contact you again in the event that positions that match your profile may open up. After two years, your data and CV will be deleted from our servers.
- 6. Further processing activities: with your specific consent, the data collected for the purposes listed above may also be processed for:
  - i) Sending you by e-mail information, by means of periodic press reviews, on the real estate sector or information on other real estate projects promoted by the data controllers.
  - ii) Processing and profiling the data collected in order to improve our services and provide you with targeted communication oriented to your interests.



All personal data collected is processed by automated means for the time strictly necessary to achieve the purposes for which it was collected.

Your data will only be processed by authorised and trained personnel.

Specific security measures are observed to prevent loss of data, illegal or incorrect use and unauthorised access.

Your personal data will not be disseminated and you are entitled to exercise your rights under Articles 15-22 of the European Regulation No. 679/2016 by writing to dpo@ecoconsult.it.

Joint data controllers, pursuant to Article 26 of European Regulation 2016/679 and following internal agreement, are Abitare Co. S.r.l., Abitare Servizi Immobiliari S.r.l., Abitare Commercial S.r.l., with registered office in Via Montenapoleone 8, 20121 Milan and Riabitare Co S.r.l. with registered office in Corso Venezia 43, 20121 Milan, Companies of the Abitare Group.

The processing operations connected to the web services of this site take place at the aforementioned premises and at the premises of the site's service provider and are carried out only by the staff of the companies, or by any persons in charge of occasional maintenance operations.

All data acquired through the online services offered by the Data Controllers may be communicated to internal staff or collaborators, but will not in any case be communicated or divulged to other parties except with the express consent of the user.