www.scsconcept.com Privacy Policy

This Application collects certain Personal Data of its Users.

Data Controller

SCS Concept S.r.l., with registered office at Via Zucchi 39/c, 20095 Cusano Milanino (MI), share capital €200,000 fully paid-upREA [Economic and Administrative Registry]:MI – 1889255, REA registration dated 24/11/2008, registered with the Companies Registry of Milan under number 1889255, VAT number 06388790963. SCS Concept S.r.l. dedicates the maximum level of attention to the security and confidentiality of its Users' Personal Data in the performance of its activities. The company is therefore the controller of the processing of the Personal Data collected on this website.

Types of Data collected

The Personal Data collected by this Application, either independently or through third parties, include: Cookies, Usage Data, e-mails and names.

Full details of each type of Data collected are provided in the dedicated sections of this privacy policy or in specific information displayed before the Data are collected. Personal Data may be freely provided by the User or, in the case of Usage Data, may be automatically collected when this Application is being used. Unless otherwise specified, all Data required by this Application are necessary. If a User refuses to communicate them, it may be impossible for this Application to provide the Service. Where this Application identifies certain Data as optional, Users are free to refrain from communicating them. In this case, there will be no consequences for the availability of the Service or its operation. Users who are in any doubt as to what Data are required are encouraged to contact the Data Controller. Unless otherwise specified, the purpose of all use of Cookies or other tracking tools by this Application or the owners of third-party services used by this Application is to provide the Service requested by the User, in addition to the other purposes described in this document and in the Cookie Policy, if available.

Users assume responsibility for any third party Personal Data obtained, published or shared through this Application, and warrant that they have the right to communicate or disseminate them, thereby releasing the Data Controller from any liability towards third parties.

Method and Location of Processing Collected Data

Processing Method

The Data Controller will take appropriate security measures to prevent the unauthorised access, disclosure, modification or destruction of Personal Data. Processing is carried out using computers and/or telematic tools and organisational methods and logics that are strictly related to the identified purposes. In certain cases, in addition to the Data Controller, other parties involved in the organisation of this Application (administrative, commercial, marketing, legal or system administrators) or external parties (such as third party technical service providers, couriers, hosting providers, IT companies and communications agencies) appointed by the Data Controller may also have access to the Data. An updated list of Data Processors may be requested from the Data Controller at any time.

Legal Basis for Data Processing

The Data Controller will process Personal Data relating to the User in the event that one of the following conditions is met:

- The User has granted consent for one or more specific purposes. Note: in some jurisdictions, the Data Controller may be authorised to process Personal Data without the User's consent or without any other of the legal bases specified below, until the User objects to ("opts out of") said processing. Nonetheless, this will not apply if the processing of Personal Data is governed by European legislation on the protection of personal data;
- the processing is necessary for the performance of a contract with the User and/or for the performance of pre-contractual measures;
- the processing is necessary in order to fulfil a legal obligation to which the Data Controller is subject;
- the processing is necessary for the performance of a task that is in the public interest or for the exercise of official powers vested in the Data Controller; or
- the processing is necessary for the pursuit of the legitimate interest of the Data Controller or third parties.

It is always possible, however, to ask the Data Controller to clarify the actual legal basis for each processing, and in particular to specify whether the processing is based on the law, provided for in a contract or required in order to conclude a contract.

Place

The Data are processed at the Data Controller's places of business and at any other place where the parties involved in the processing are located. For further information, please contact the Data Controller. Users' Personal Data may be transferred to a country other than the one in which they are located. To obtain further information on the place of processing, Users may refer to the section on the details of the processing of Personal Data.

Users have the right to obtain information on the legal basis for the transfer of Data outside the European Union or to an international organisation governed by public international law or consisting of two or more countries, such as the UN, and on the security measures taken by the Data Controller to protect the Data. If one of the above-mentioned transfers is made, Users may refer to the relevant sections of this document or request information from the Data Controller by using the contact details provided at the top of this document.

Storage Period

Data are processed and stored for the period of time required for the purposes for which they were collected.

Accordingly:

- Personal Data collected for purposes relating to the performance of a contract between the Data Controller and the User will be retained until performance of said contract has been completed.
- Personal Data collected for purposes relating to the lawful interests of the Data Controller will be retained until such time as said interests have been satisfied. Users may obtain further information on the lawful interests pursued by the Data Controller in the relevant sections of this document or by contacting the Data Controller.

When processing is based on User consent, the Data Controller may retain the Personal Data for a longer period, until said consent is revoked. In addition, the Data Controller may be required to retain Personal Data for a longer period in accordance with a legal obligation or by order of an authority. The Personal Data will be deleted at the end of the storage period. Accordingly, on the expiry of said period, it will no longer be possible to exercise the right of access, deletion, rectification or Data portability.

Purpose of Processing Collected Data

User Data are collected to enable the Data Controller to provide its services, as well as for the following purposes: statistics, contacting the User and interacting with social networks and external platforms. To obtain further detailed information on the purposes of the processing and the Personal Data specifically relevant for each purpose, Users may refer to the relevant sections of this document.

Details on the Processing of Personal Data

Personal Data are collected for the following purposes and by using the following services:

Contacting Users

Mailing lists or newsletters (this Application)

When Users register on the mailing list or to receive the newsletter, their e-mail addresses are automatically included in a list of contacts to which e-mail messages containing information relating to this Application, including commercial and promotional information, may be sent. Users' e-mail addresses may also be added to this list as a result of registering for this Application or after making a purchase.

Personal Data collected: e-mail and name.

Interaction with social networks and external platforms

This Service makes it possible to interact with social networks or other external platforms directly from the pages of this Application. In any event, interactions and the information acquired from this Application are subject to the User's privacy settings for each social network. If an interaction service is installed with social networks, it is possible that it will collect traffic data relating to the pages on which it is installed even if Users do not use the service.

Linkedin button and social widgets (LinkedIn Corporation)

The LinkedIn button and social widgets are LinkedIn social networking services provided by LinkedIn Corporation.

Personal Data collected: Cookies and Usage Data.

Processing location: United States – <u>Privacy Policy</u>. Party adhering to the Privacy Shield.

Facebook "Like" button and social widgets (Facebook, Inc.)

The Facebook "Like" button and social widgets are social networking services provided by Facebook, Inc.

Personal Data collected: Cookies and Usage Data.

Processing location:United States – <u>Privacy Policy</u>.Party adhering to the Privacy Shield.

Google+ +1 button and Google+ social widgets (Google LLC)

Google+'s +1 button and social widgets are interaction services with the Google+ social network, and are provided by Google LLC.

Personal Data collected: Cookies and Usage Data.

Processing location: United States – Privacy Policy. Party adhering to the Privacy Shield.

Tweet button and Twitter social widgets (Twitter, Inc.)

The Tweet button and Twitter social widgets are social networking services provided by Twitter, Inc.

Personal Data collected: Cookies and Usage Data.

Processing location: United States – Privacy Policy. Party adhering to the Privacy Shield.

YouTube button and social widgets (Google LLC)

The YouTube button and social widgets are interaction services with the YouTube social network, and are provided by Google LLC.

Personal Data collected: Usage Data.

Processing location: United States – Privacy Policy. Party adhering to the Privacy Shield.

Statistics

The services in this section enable the Data Controller to monitor and analyse traffic data and are used to keep track of Users' behaviour.

Google Analytics (Google LLC)

Google Analytics is a web analytics service provided by Google LLC ("Google"). Google uses the Personal Data collected for the purpose of tracking and examining the use of this Application and compiling reports and sharing them with other services developed by Google. Google may use Personal Data to contextualize and customize ads on its advertising network.

Personal Data collected: Cookies and Usage Data.

Processing location:United States – <u>Privacy Policy</u> – <u>Opt Out</u>.Party adhering to the Privacy Shield.

Viewing Content from External Platforms

This service makes it possible to view content hosted on external platforms directly from the pages of this Application and to interact with them. If a service of this kind is installed, it is possible that it will collect traffic data relating to the pages on which it is installed even if Users do not use the Service.

Google Fonts (Google LLC)

Google Fonts is a font viewing service operated by Google LLC that allows this Application to integrate said content into its pages.

Personal Data collected: Usage Data and various types of Data as specified in the privacy policy of the service.

Processing location: United States – <u>Privacy Policy</u>. Party adhering to the Privacy Shield.

YouTube Video Widget (Google LLC)

YouTube is a video content viewing service managed by Google LLC that allows this Application to integrate said content into its pages.

Personal Data collected: Cookies and Usage Data.

Processing location: United States – <u>Privacy Policy</u>. Party adhering to the Privacy Shield.

WPML

WPML uses cookies to identify the language of the current visitor, that of the last visit and that of the users who have logged in.

When using the plugin, WPML will share site data through the installer. No personal user data will be shared.

Platform and Hosting Services

The purpose of these services is to host and operate key components of this Application, thereby making it possible to deliver it from a single platform. These platforms provide the Data Controller with a wide range of tools, including analytical tools, for User registration management, comment and database management, e-commerce, payment processing, etc. The use of these tools involves the collection and processing of Personal Data. Some of these services operate through servers that are in different geographical locations. This makes it difficult to determine the exact place at which Personal Data is being stored.

The Data are retained in accordance with the regulations in force in the European Community

Data Transfer outside the EU

The Data Controller may only transfer Personal Data collected within the EU to third countries (that is, all non-EU countries) in accordance with a specific legal basis. These Data transfers are therefore carried out according to one of the legal bases described below.

Users may request information from the Data Controller regarding the applicable legal basis that actually applies to each individual service.

Transfer of Data from the EU and/or Switzerland to the United States based on the Privacy Shield (this Application)

Where this is the legal basis, the transfer of Personal Data from the EU or from Switzerland to the US takes place under the EU – US or Switzerland – US Privacy Shield Agreement. In particular, Personal Data is transferred to parties who have self-certified within the context of the Privacy Shield and therefore guarantee an adequate level of protection of the transferred Data. The services involved in the transfer of Data are listed in the respective sections of this document. Those services that adhere to the Privacy Shield can be identified by consulting the relevant privacy policy or by verifying the status of their inclusion in the official list of the Privacy Shield services rights under the Privacy Shield are described in a continuously updated form on the website of the U.S. Department of Commerce. The transfer of Personal Data from the EU or Switzerland to the US to parties that are not (or are no longer) registered with the Privacy Shield is only admissible on another valid legal basis. Users may request information on these legal bases from the Data Controller.

Personal Data collected: various types of Data.

Transfer of Data to countries that guarantee European standards (this Application)

Where this is the legal basis, the transfer of Personal Data from the EU to third countries takes place on the basis of an adequacy decision adopted by the European Commission. The European Commission adopts adequacy decisions with regard to individual third countries it considers will ensure a level of protection of Personal Data comparable to that provided by European legislation on the protection of Personal Data. Users may view an updated list of adequacy decisions on the website of the European Commission.

Personal Data collected: various types of Data.

Other legal basis for the transfer of Data to third countries (this Application)

Where no other legal basis is applicable, Personal Data may only be transferred from the EU to third countries on one of the following conditions:

- the transfer is necessary in order to perform a contract concluded between the User and the Data Controller or pre-contractual measures adopted at the request of the User;
- the transfer is necessary for the conclusion or performance of a contract entered into by the Data Controller and another natural or legal person in the interests of the User;
- the transfer is necessary for reasons of public interest; * the transfer is necessary in order to investigate, exercise or defend a legal claim;
- the transfer is necessary to protect the vital interests of the interested party or other persons where the interested party is physically or legally incapable of granting consent. In such cases, the Data Controller will inform the User of the legal basis applicable to the transfer through this Application.

Personal Data collected: various types of Data.

User Rights

Users may exercise certain rights with regard to the Data processed by the Data Controller.

In particular, they have the right to:

- **revoke their consent at any time.** Users may revoke their consent to the processing of their Personal Data as set forth above.
- **object to the processing of their Data.**Users may object to the processing of their Data where it takes place on a legal basis other than consent. Further details on the right to object are provided in the section below.
- access their Data. Users have the right to obtain information on the Data processed by the Data Controller and on certain aspects of the processing, and to receive a copy of the Data processed.
- **verify and request correction.**Users may verify the correctness of their Data and request that they be updated or corrected.
- **obtain restrictions on processing.** When certain conditions are met, Users may request that the processing of their Data be restricted. In such a case, the Data Controller will not process the Data for purposes other than their storage.
- **secure the deletion or removal of their Personal Data.** When certain conditions are met, Users may request deletion of their Data by the Data Controller.
- receive their Data or have them transferred to another controller. Users have the right to receive their Data in a structured, commonly used format that can be read by an automatic device, and, where technically feasible, to secure the transfer of said Data to another

- controller without hindrance. This provision will apply in cases when the Data is processed using automated tools and the processing is based on the User's consent, on a contract to which the User is a party or on contractual measures associated with it.
- **to lodge a complaint.** The User may lodge a complaint with the competent Data protection supervisory authority or take legal action.

Details of the Right of Objection

When Personal Data are processed in the public interest, in the exercise of public powers vested in the Data Controller or to pursue a legitimate interest of the Data Controller, Users have the right to object to the processing for reasons relating to their particular situation.

Users are reminded that if their Data is processed for direct marketing purposes, they may object to the processing without providing any reason. To find out whether the Data Controller processes Data for direct marketing purposes, Users may refer to the respective sections of this document.

How Users may Exercise their Rights

In order to exercise their rights, Users may send a request to the Data Controller's contact details identified in this document. Requests are filed free of charge and are processed by the Data Controller as soon as possible, in any event within one month.

Further Information on Processing

Defence in court proceedings

Users' Personal Data may be used by the Data Controller in legal proceedings or in the preparatory phases of legal proceedings to defend against misuse of this Application or its related services by the User. The User declares that he or she is aware that the Data Controller may be required to disclose the Data by order of the public authorities.

Specific Information

In addition to the information contained in this privacy policy, this Application may provide Users with additional contextual information on specific services, or the collection and processing of Personal Data, on request.

System Log and Maintenance

For operating and maintenance purposes, this Application and any third-party services used by it may collect system logs: that is, files that record interactions and which may also contain Personal Data such as a User's IP address.

Information not Included in this Policy

Further information on the processing of Personal Data may be requested from the Data Controller at any time by using the contact details.

Response to "Do Not Track" requests

This Application does not support "Do Not Track" requests. In order to discover whether any third party services that may be used support them, Users should refer to their privacy policies.

Amendments to this Privacy Policy

The Data Controller reserves the right to make amendments to this privacy policy at any time by informing Users on this page and, if possible, on this Application and, where technically and legally feasible, by sending a notice to Users by means of one of the contact details in the Data Controller's possession. Please consult this page regularly, making sure to check the date of the most recent amendment, which may be found at the bottom of the page. If the amendments involve processing that uses consent as the legal basis, the Data Controller will obtain the User's consent again, if required.

Definitions and Legal References

Personal Data (or Data)

Personal Data means any information that, directly or indirectly makes a natural person identified or identifiable, including in association with any other information, including a Personal identification number.

Usage Data

This means information that is automatically collected through this Application (including by third party Applications integrated into this Application), including: IP addresses or domain names of computers used by Users who connect with this Application, addresses in URI (Uniform Resource Identifier) notation, the time of the request, the method used to forward the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc.), the country of origin, the characteristics of the browser and operating system used by the visitor, the various time connotations of the visit (for example, the amount of time spent on each page) and details of the itinerary followed within the Application, with particular reference to the sequence of pages consulted, the parameters relating to the operating system and the User's computer environment.

User

An individual using this Application, who, unless otherwise specified, is the same as the Interested Party.

Interested Party

The natural person to whom the Personal Data refers.

Data Supervisor (or Supervisor)

The natural or legal person, public administration or any other entity that processes Personal Data on behalf of the Data Controller, as set forth in this privacy policy.

Data Controller of the Processing (or Data Controller)

The natural or legal person, public authority, agency or other body that, alone or jointly with others, determines the purposes and means of the processing of Personal Data and the instruments adopted, including security measures relating to the operation and use of this Application. Unless otherwise specified, the Data Controller is the owner of this Application.

This Application

The hardware or software tool through which User Personal Data is collected and processed.

Service

The service provided by this Application as defined in the relevant terms (if any) on this site/Application.

European Union (or EU)

Unless otherwise stated, any reference in this document to the European Union will be deemed to extend to all current Member States of the European Union and the European Economic Area.

Cookies

Small amounts of Data stored on the User's device.

Legal References

This privacy policy has been drawn up on the basis of a number of legal systems, including Articles 13 and 14 of Regulation (EU) 2016/679.

Unless otherwise stated, this privacy policy applies exclusively to this Application.