PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

Pursuant to the applicable legislation on personal data protection, with particular reference to Article 13 of Regulation (EU) 2016/679 ("**GDPR**") and Legislative Decree 196/2003, as amended (collectively, the "**Privacy Legislation**"), Design Management S.r.l., acting as Data Controller ("**DeMa**" or the "**Controller**"), wishes to inform individuals enrolled in The Mall Club (the "**Participant**") who will take part in the prize competition called "**Holiday Contest**" (the "**Contest**"), through the websites https://firenze.themall.it/ or https://sanremo.themall.it/ (the "**Website**"), about the methods and purposes of the processing of their personal data provided during participation. The Contest rules (the "**Rules**") are available at: https://backend.themall.it/pdf/holiday-regolamento-en.pdf

PERSONAL DATA PROCESSED

DeMa will process certain personal data provided by the Participant at the time of purchase completion (The Mall Club QR code), including in particular: first name, last name, email address, and telephone number. DeMa will verify that the email address provided by the Participant during registration corresponds to the one supplied when joining The Mall Club.

PURPOSES AND LEGAL BASES FOR PROCESSING

Providing personal data is strictly necessary for participation in the Contest. Without such data, DeMa will not be able to allow participation.

The legal basis for processing is the necessity to perform the Rules, enabling registration and participation in the Contest, as well as carrying out all related activities (including prize draws), pursuant to Article 6(1)(b) GDPR.

The Participant's personal data may also be processed by the Controller for the following purposes:

- Sending service communications related to the Contest, including any assistance requests submitted directly by the Participant, pursuant to Article 6(1)(b) GDPR;
- Compliance with legal obligations applicable to the Controller or orders from competent authorities, pursuant to Article 6(1)(c) GDPR;
- Establishing, exercising, or defending the Controller's legal rights, pursuant to Article 6(1)(f) GDPR.

PROCESSING METHODS

Personal data will be processed in accordance with the principles of lawfulness, fairness, and transparency, using both electronic and manual tools, under measures designed to ensure data security and confidentiality, in full compliance with applicable legislation, particularly to reduce the risks of destruction, loss, alteration, unauthorized disclosure, or accidental or unlawful access to the processed data.

WHO WILL PROCESS THE DATA

Personal data will be processed exclusively by employees or collaborators of DeMa who have been duly authorized in writing and instructed regarding the security measures necessary to ensure adequate data protection.

Any party that, in connection with support services or activities related to the Contest, accesses and processes data on behalf of DeMa will act under specific agreements concluded with the Controller as a Data Processor pursuant to Article 28 GDPR (for example, Clipper S.r.l.).

Personal data may also be disclosed to independent data controllers, such as judicial authorities and other competent authorities, where required to comply with legal obligations and/or official requests or orders.

INTERNATIONAL DATA TRANSFERS

Processing activities will take place exclusively within the European Economic Area (EEA). Therefore, Participants' personal data will not be transferred to third countries.

DATA RETENTION PERIOD

DeMa will process and retain personal data only for as long as strictly necessary to achieve the purposes described above. In particular, Participant data will be retained for the period necessary to manage the Contest, including prize delivery to winners, and will be deleted within six months from the prize draw, in accordance with the timeframes established by legislation governing prize competitions and promotional operations.

Notwithstanding the above, data may be retained for longer periods where required by law or by measures issued by competent authorities, or where necessary for the Controller to establish, exercise, or defend its legal rights.

PARTICIPANT RIGHTS

The Participant may exercise the rights granted under data protection legislation at any time, including the right to request:

- Confirmation as to whether personal data concerning them is being processed and, if so, access to such data, together with information regarding processing purposes, categories of personal data, recipients, retention periods, applicable rights, and the existence of automated decision-making, including profiling;
- Updating and rectification of inaccurate personal data without undue delay;
- Erasure of personal data in the cases provided for by Article 17 GDPR;
- Restriction of processing, where one of the conditions set out in Article 18 GDPR applies;
- Data portability, by receiving a copy of their data in a structured, commonly used, and machine-readable format, and transmitting it to another controller without hindrance from DeMa.

The Participant also has the right to lodge a complaint at any time with the competent Data Protection Authority if they believe that the processing carried out by DeMa violates applicable privacy legislation.

CONTROLLER AND DATA PROTECTION OFFICER CONTACT DETAILS

The Data Controller is Design Management S.r.l. Unipersonale, with registered office in Milan (MI), Via San Paolo No. 7, VAT No. 05063610488.

To exercise the rights described above or to obtain further information regarding the processing of personal data described in this Privacy Notice, Participants may contact DeMa's Data Protection Officer (DPO) at: **dpo@themall.it**.