

## **Privacy Policy**

The purpose of this *Privacy Policy* is to describe the way in which **Interpump Group** website (the "**Site**") is managed regarding the processing of the personal data of the natural persons who consult it and interact with its services and functionalities (the "**Users**" or the "**Data Subject**"). Other websites that may be consulted by the User through *links* accessible from the Site are not covered by this *Policy*.

### **Data Controller**

The Data Controller is **Interpump Group S.p.A.** with registered office at Via Enrico Fermi, 25, 43029 - Sant'Ilario d'Enza (RE) (the "**Company**" or "**IPG**"), who can be contacted at the following e-mail address: dpo@interpumpgroup.it. The Data Controller has appointed its own *Data Protection Officer* ("**DPO**"). The DPO may be contacted at the following e-mail address: dpo@interpumpgroup.it.

### **Types of data collected**

The following are the categories of personal data (hereinafter referred to as "**Personal Data**" or even just "**Data**") that we collect when you access our Site.

#### **A. Automatic navigation data**

The Site's computer systems collect only certain Data, whose transmission is implicit in using Internet communication protocols. This Data includes the following information: Internet *browser* and operating system used, domain names of the *website* of origin, number of visits, average time spent on the site, pages viewed. This information is not collected for user identification. However, should processing and association with data held by third parties be needed, users could be identified in cases where there has been an infringement of IPG.

#### **B. Data provided voluntarily by the User**

Should you choose to navigate the Site, you may be asked to provide certain identification and contact data (i.e. name, surname, e-mail address) by filling in the forms on the Site.

#### **C. Institutional and governance information data**

By using our Site, it's possible to freely access certain content (informational materials related to news, corporate governance, institutional communications) posted on the Site.

#### **D. Cookie**

Information on the use of cookies can be found in the **Cookie Policy** of the Site.

### **Optional supply of Personal Data**

Your Personal Data may be freely provided or, in the case of navigation data, automatically collected during the use of our Site. Where specified (i.e. Personal Data marked with an asterisk) the provision of Personal Data is necessary to provide you with the requested service: refusal to provide such Data may make it impossible for the Controller to fulfil your request. About the Personal Data not indicated as required, you have the option to withhold this information. Please note that doing that will not affect the availability of the service or the functionality of the Site.

### **Treatment modalities**

The Data Controller takes proper security measures to prevent unauthorised access, disclosure, modification, or destruction of Personal Data. The processing is conducted using computer and/or telematic tools, with organisational methods and logics strictly related to the purposes showed below.

## Recipients or categories of recipients of Personal Data

The processing of your Personal Data will be conducted by employees of the Company who are authorised by IPG and have received adequate instruction on the correct methods of processing for the purposes showed below. To provide services, your Personal Data may be shared with third parties involved in activities, such as support and consultancy services in technology, law and insurance, Interpump Group companies. The categories of subjects to which the data may be communicated will use them in their role as Data Processors. These subjects will be specifically appointed by IPG pursuant to Article 28 GDPR or as autonomous Data Controllers. Finally, Personal Data may be communicated to private entities or public authorities that have access to the same by virtue of provisions of law or other measures issued by competent authorities.

## Place and transfer of Personal Data

The data collected by the website is processed at the premises of the Data Controller and in any other place where the parties involved in the processing are located. If IPG need to transfer Personal Data outside the European Union, to countries not considered adequate by the European Commission, IPG will take the necessary measures to protect Users' Personal Data in compliance with the guarantees provided by law, pursuant to the applicable legislation and, in particular, articles 45 and 46 GDPR.

## Purpose of processing, legal basis, and retention period

Below, IPG describes the purpose of the processing of Users' Personal Data, the legal bases that make the processing lawful, and the relevant retention period.

Purpose of processing	Legal basis	Retention period
a. Allow Users to browse the site	Processing is necessary for the performance of pre-contractual measures taken at the request of the Data Subject (Art. 6(1)(b) GDPR)	For a period, equal to the duration of the provision of the requested services and for 10 years thereafter (limitation period for any contractual liability)
b. Manage the request to subscribe to the e-mail alert service to receive institutional communications and updates on IPG activities	Legitimate interest of the owner in keeping requesting data subjects up-to-date with respect to business activities (Art. 6, p. 1, lett. f GDPR)	Personal Data will be retained for 7 years. This is without prejudice to the possibility for the Data Subject to unsubscribe from the e-mail alert service
c. To comply with obligations arising from national or EU regulations or legislation (i.e. tax and accounting obligations) or handling or responding to requests from judicial or administrative and tax authorities	Processing is necessary for the performance of a legal obligation to which the Data Controller is subject (Art. 6(1)(c) GDPR)	Personal Data will be kept for as long as necessary to fulfil the authority's requests
d. Obtain the information necessary to detect anomalies, fraudulent activity, and/or abuse in the use of the Site or to exercise the Company's rights	Legitimate interest of the Data Controller in the proper functioning of the Site, the prevention of unlawful conduct and the exercise of its rights (Art. 6(1)(f) GDPR)	Personal Data will be retained for the period necessary to settle disputes or to respond to requests from competent authorities
e. Conducting analysis and research (anonymously or in aggregate) in relation to the products and services provided to improve and develop our products and services and for statistical and internal reporting purposes, including in the context of intra-group information flows	Legitimate interest of the data controller in improving its core business and economic strategies (Art. 6(1)(f) GDPR)	For as long as necessary to conduct the activities in question, in any case no longer than 3 years after the last registration

## Rights of the Data Subject

Regarding your Personal Data, you may, at any time, exercise the following rights in relation to the Data Controller:

**a. Right of access and to obtain a copy of Personal Data (Art. 15 GDPR)**

The Data Subject may obtain confirmation as to whether Personal Data relating to him or her is being processed, also to have knowledge of such processing and to check that it is lawful, correct and up to date. In this case, the Data Subject will be able to obtain access to his/her Personal Data and information, in particular, information on the purposes of the processing, the categories of Personal Data concerned, the recipients or categories of recipients to whom the Data are or will be communicated, the storage period, etc.

**b. Right to rectification of Personal Data (Art. 16 GDPR)**

The Data Subject may obtain, without undue delay, the rectification of inaccurate Personal Data concerning him or her or the integration of the same, if incomplete.

**c. Right to erasure of Personal Data (Art. 17 GDPR)**

The Data Subject may obtain, without undue delay, the deletion of Personal Data concerning him or her, if the Data are no longer necessary to fulfil the purposes for which they were collected. Please note that deletion is subject to the existence of valid reasons.

**d. Right to restriction of processing of Personal Data (Art. 18 GDPR)**

The Data Subject may obtain the restriction of the processing of Personal Data concerning him or her, or the marking of the Data used to restrict its processing in the future.

**e. Right to data portability (Art. 20 GDPR)**

In the event of automated processing carried out on the basis of consent or in performance of a contract, the Data Subject has the right to receive from the Data Controller, in a structured, commonly used and machine-readable format, the data concerning him/her and to transmit them to another Data Controller.

**f. Right to object to processing (Art. 21 GDPR)**

The User has the right to object to the processing of Personal Data concerning him/her, unless there are reasons of legitimate interest of the Controller that justify the continuation of the processing.

**g. Right to withdraw consent freely given (Art. 7 GDPR)**

The Data Subject shall have the right to withdraw consent at any time without prejudice to the lawfulness of processing based on consent given before the withdrawal, only for the purposes for which consent is the legal basis.

The Data Subject may exercise his or her rights by sending a request to the Data Controller by e-mail to: [dpo@interpumpgroup.it](mailto:dpo@interpumpgroup.it)

Requests relating to the exercise of the Data Subject's rights will be processed without undue delay and, in any event, within 30 days of receipt of the request.

In any event, the Data Subject always has the right to lodge a complaint with the competent supervisory authority pursuant to Article 77 of the GDPR if he or she considers that the processing of his or her data is contrary to the applicable data protection legislation. For Italy, the supervisory authority is the Garante Per La Protezione Dei Dati Personali ("**Garante**"), which can be contacted by the methods indicated at the following link: <https://www.garanteprivacy.it/home/footer/contatti>.

**Information not contained in this *Privacy Policy***

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

**Changes to this *Privacy Policy***

The Data Controller reserves the right to amend this *Privacy Policy* at any time by notifying Users on this page as well as, if technically and legally feasible, by sending a notification to Users through one of the contact details it has.

**Version updated 31/01/2025**