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PRIVACY POLICY – P ZERO EXPERIENCE - ON LINE SALES AUSTRIA (ENGLISH VERSION)

1. LEGAL INFORMATION

This Privacy Policy was last updated on 26 March 2024.

- 1.1** The privacy of your Personal Data is of the utmost importance to us. This privacy policy (the “**Privacy Policy**”) covers and is designed to help you understand how we process the information that we collect about you, that you provide to us online or that we collect on you and any of your accompanying persons within the scope of the sale of P ZERO™ Experience packages by PIRELLI (as defined in art. 1.2 below and described more fully in the General Conditions of Sale).
- 1.2** Pirelli Tyre S.p.A., with registered offices at Viale Piero e Alberto Pirelli 25, 20126 Milan, Italy, Fiscal Code, VAT and Milan Monza Brianza Lodi Business Registry Enrolment n. 07211330159 and Pirelli GmbH, with registered office at Lemboeckgasse 47 A, 1230 Wien, Austria, Vat No: ATU14205803 (hereinafter respectively referred to as “Pirelli”, and “Pirelli GmbH”, “we”, “us” or “our”, as appropriate) will act each as independent “Controller” of Personal Data provided for purposes of participation in the P ZERO™ Experience, for the purposes detailed in Section 3.

2. COLLECTION OF INFORMATION

- 2.1** We collect personal data, which under applicable data protection legislation, in particular Regulation EU 679/2016 of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (also referred to as the “**GDPR**”), includes information that can be used to identify you, including - but not limited to - your first and last name, street address, ZIP/postal code, city, country, state, phone number and email address (hereinafter as “**Personal Data**”).

Information you provide to us

- 2.2** We may collect your name, your date of birth, contact information, e-mail address, home address, name and date of birth of your companions (if any) and any other information you provide when interact with us, or when you contact us.

Technical information

- 2.3** When you browse our website, we may collect information which can be used to identify your computer and its browser program or any mobile devices that you use to surf the internet. It is collected by installing small text files called “**Cookies**” and other, similar information technology techniques (which are comprehensively referred to in this document as “**Cookies**”). In addition to other functions, when you visit our website(s) again, the Cookies previously stored allow us to recognize your browser. Cookies may store unique identifiers, user preferences, or other information as described in our Cookie Policy.
- 2.4** For any other information on the Cookies we use, please refer to our Cookie Policy.

3. USE OF PERSONAL DATA AND LEGAL BASIS FOR THE PROCESSING

- 3.1** We may use your Personal Data for the following purposes:



- (i) to allow your registration to our website dedicated to the P ZERO™ Experience;
- (ii) to respond to your requests of assistance to the *Customer Care*;
- (iii) to sell you the P ZERO™ Experience Package and managing the organization of the event. For this specific purpose, your Personal Data will be processed by Pirelli GmbH as autonomous Controller.

The processing of your Personal Data for purposes of this Section 3. is necessary to fulfil your request and therefore it does not require your prior consent.

- 3.2** Pirelli may also use your Personal Data for marketing purposes, as described under Section 7 below, and subject to your prior consent.
- 3.3** The provision of your Personal Data is voluntary but necessary for purposes of this Section 3; in the event you do not provide us your Personal Data, it will be impossible for us to carry out such activities.

4. SHARING OF PERSONAL DATA

- 4.1** We may share your Personal Data when authorized by law or as follows:

- (a) Pirelli Group companies. Your Personal Data may be shared with Pirelli & C. S.p.A. and/or with other Pirelli Group companies incorporated in Europe, to pursue legitimate interests related to the performance of technical and organizational activities functional to the purposes described in Section 3.
- (b) Payments by credit card. In order to allow you to pay by credit card, your Personal Data will be processed by a payment services provider selected by PIRELLI, which shall act as autonomous personal data controller, by means of a protected website managed by such provider.
- (c) Third Parties. Your Personal Data may also be processed by service providers and/or insurance companies appointed by Pirelli. The insurance companies will act as independent Personal Data Controllers. The other third parties will act, unless otherwise specified, as Data Processors. These third parties are subject to confidentiality agreements with us and other legal restrictions that prohibit their use of the information we provide them for any purpose other than to perform the specific related operation, unless you have explicitly agreed or given your prior permission to them for additional uses.
- (d) As permitted or required by law. In certain cases, we may be required to provide Personal Data in response to a valid court order, subpoena, government investigation, or as otherwise required by law. We also reserve the right to report to law enforcement agencies any activities that we, in good faith, believe to be unlawful or in violation of applicable laws. We may release certain Personal Data when we believe that such release is reasonably necessary to protect the rights, property, and safety of others and ourselves, or to detect, prevent, or otherwise address fraud, security, or technical issues.
- (e) Business transaction. In the event that we intend to sell or transfer ownership or control of any or all of our business, operations or services to a third party, we may need to disclose your Personal Data to a potential buyer both before and after the purchase. We will do so in accordance and in compliance with the data protection laws applicable to you. In any case, in the event the sale goes through, we will require that the receiving party agree that they will be similarly bound by the provisions of this Privacy Policy and that they will only use and disclose your Personal Data as we are similarly entitled under this Privacy Policy. In the event the sale does not go through, we will require the potential purchaser to not use or disclose your Personal Data in any manner whatsoever and to completely erase the same.

5. THE PRIVACY RIGHTS OF THE PARTICIPANTS TO THE P ZERO™ EXPERIENCE

- 5.1** Participants to the P ZERO™ Experience have several privacy rights in accordance with the data protection laws applicable to you. According to GDPR provisions, he/she has the right to access to his/her data processed by us, correct it, delete it, limit/restrict the processing of his/her data that can be performed by us, and he/she has the right to your Personal Data portability and the right to be notified about any possible data breaches of the safety of his/her Personal Data that may put at risk his/her rights to confidentiality and personal data protection. In order to exercise his/her rights he/she can contact Pirelli Tyre S.p.A. at privacy.europe@pirelli.com and Pirelli GmbH at DPO.West.Europe@pirelli.com. He/she can also lodge a complaint with the authority competent in his/her country, in accordance with applicable data protection laws. We may not be able to accommodate every request related to certain information if we believe this would violate any law or other legal requirement, or other data subjects' rights.

6. RETENTION OF PERSONAL DATA

- 6.1** We will retain Personal Data of participants to the P ZERO™ Experience as follows: (i) if you have submitted support requests without creating an account, for a period of 1 (one) year from our last communication; ; (ii) if you have created an account, for a period of 3 (three) years from the date of the collection of such data , except where it is necessary to retain it for longer periods due to mandatory provisions of law; (iii) for marketing purposes, for a period of 3 (three) years from the date of collection your consent, unless you request otherwise (in this case, limited to Personal Data of participants who have provided marketing consent).

Furthermore, if within the period indicated in paragraphs (ii) and (iii) you take actions on your account or on one of Pirelli's websites or apps (such as, by way of example and not limitation, registering for promotions or events, requesting new services, responding to surveys) that demonstrate your interest in maintaining the account or relationships and contacts with Pirelli related to Pirelli's products and/or services and/or Pirelli group companies, we will retain your Personal Data for an additional 7 (seven) years from the date of registering such actions, without, however, sending marketing communications in the absence of your specific consent.

Following the data retention periods for the purposes stated above, your Personal Data will be archived and retained where necessary (for example, in relation to products and/or services you have purchased or used, or in the event of your participation in contests), for the period of time required by applicable laws concerning the storage of data and documents for administrative, accounting, tax, and defensive purposes (in accordance with the applicable statute of limitations).

7. COMMERCIAL ELECTRONIC COMMUNICATIONS

- 7.1** When you opt-in to receive direct marketing emails or communications, you consent to Pirelli to send you any promotional emails (including newsletters) and other commercial electronic communications concerning products and/or services of Pirelli or of other Pirelli Group Companies. You can always limit the communications that Pirelli sends to you. To refuse future commercial emails, simply click the link labelled “unsubscribe” at the bottom of any email Pirelli sends you.
- 7.2** Bear in mind that even if you have decided not to receive promotional emails in the future, it might still be necessary for us to contact you regarding important information about your account, in accordance with applicable data protection laws. Should you require information or assistance on how to unsubscribe, contact us by email at the e-mail addresses indicated in Section 13 below.



8. WHERE WE STORE YOUR PERSONAL DATA OF PARTICIPANTS TO THE P ZERO™ EXPERIENCE

- 8.1** Pirelli will store your Personal Data of participants to the P ZERO™ Experience in the European Union.

9. PRIVACY POLICIES OF THIRD PARTIES

- 9.1** This Privacy Policy only addresses the use and disclosure of information by Pirelli. We are not responsible for the privacy policies of other websites or application and encourage you to read all applicable terms, conditions and privacy policies provided by all third parties prior to providing them with your information.

10. LIMITATIONS TO MINORS' PERSONAL DATA

- 10.1** If you are a minor, according to Austrian laws, please do not provide us any Personal Data about yourself without the provision of adequate consent by the holder of parental responsibility over you. If we learn that we have collected Personal Data from a minor, without the holder of parental responsibility's consent, we will promptly delete that information. If you believe we have collected Personal Data from a minor, please contact us at the e-mail addresses indicated in Section 13 below.

11. SECURITY OF PERSONAL DATA

- 11.1** We have security protocols in place to protect Personal Data from unauthorised access, improper use or disclosure, unauthorised modification, and unlawful destruction and accidental loss. We only allow access to our databases when necessary, and then under strict guidelines as to what use may be made of such data.
- 11.2** It is your responsibility to protect the security of your login information, and we recommend that you use a unique password for our website that is different from the password you may use on any other site.

12. CHANGE OF PRIVACY POLICY

- 12.1** Privacy laws and practice are constantly developing. Our policies and procedures are therefore under continual review. Our Privacy Policy may change from time to time but we will not reduce your rights under this Privacy Policy without your explicit consent. The date the Privacy Policy was last revised is identified at the top of the page.

13. HOW TO CONTACT US

- 13.1** If you have questions or concerns regarding this Privacy Policy, or if you wish to review, edit your Personal Data or request that we delete Personal Data stored in the databases we actively use, please contact Pirelli Tyre S.p.A. at: privacy.europe@pirelli.com or Pirelli GmbH at: DPO_West.Europe@pirelli.com.

You may also contact the Data Protection Officer ("DPO") of Pirelli Tyre S.p.A. at the Company's registered office, e-mail DPO_Ptyre@pirelli.com.