

# Palladium Group of Companies GEIE

5, Rue de Bonnevoie L-1260 Luxembourg

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## **Information on the Processing of Personal Data carried out by Palladium Group of Companies GEIE ("The Group" or "Data Controller") provided to the Data Subject under Art. 13 of Regulation (EU) 2016/679 (from now on "Regulation" or "GDPR")**

Before processing any Personal Data (in the future also "**Data**"), the Controller must inform you (the "**Data Subject**") on the why and how of the Data Processing. For that reason, this notice will give you all the information you need so that you can provide your Data in an informed and conscious manner and, at any time, request and obtain clarifications or corrections, as well as exercise your rights.

### **1. Data controller**

The Regulation defines the Data Controller as the natural or legal person, public authority, service or other bodies that, individually or jointly with others, determines the purposes and means of the processing of personal data.

In this case, the Data Controller is **Palladium Group of Companies GEIE**, with registered office in 5, Rue de Bonnevoie L-1260 Luxembourg, registration number D115.

### **2. Type of Personal Data collected**

The website you are visiting acquires various kinds of Personal Data, such as:

- i. **Data freely communicated by the User** via email, personally, postal mail or telephone, such as place, initiative requested, name, surname, telephone, e-mail and request description.;
- ii. **Data collected automatically** as a result of your navigation on the site, such as IP addresses, time of the request, country of origin, characteristics of your browser and operating system.

The Data Controller will process your Data in compliance with the provisions of the law and the principles applicable to the protection of Personal Data. Processing operations will only take place with regard to the purposes indicated in paragraph 3 below and according to methods and procedures aimed at ensuring the integrity, availability and confidentiality of what you share with us.

### **3. Purposes of the processing**

In this paragraph, we will describe you the purposes - in other words, the **reasons** - for which we request and process your Data.

Here are our goals:

- i. **Handle** your requests regarding Group initiatives, either if we receive them by telephone, e-mail, personally or through postal mail to the address of the Company. The Data processed for the pursuit of such purpose are listed in the previous § 2, n. (i);
- ii. **Manage** your browsing and allow the technical functioning of the website, also in order to improve its performance. Data processed for the pursuit of this purpose are those listed in the previous § 2, n. (ii);
- iii. **Contact** you for promotional purposes, also via newsletters. The Data processed for the pursuit of this purpose are those listed in the previous § 2, n. (i and ii);
- iv. **Carry out** analyses to understand, for example, how the site is used, which are the most viewed contents as well as offers of particular interest to the public. The Data processed for the pursuit of this purpose are those listed in the previous § 2, n. (ii). We list the suppliers we use and invite you to read their privacy policy if you would wish further information:

Google Analytics, is a tool provided by Google Inc. which installs a cookie on your browser and collect information about your use of the website. This information is then received by the Data Controller in one or more reports and can be shared with advertising partners to send promotions in line with your preferences. The Google Analytics privacy policy is available at <https://policies.google.com/privacy?hl=en>, and if you wish to object to the use of this technology, you may visit the following page: <https://tools.google.com/dlpage/gaoptout?hl=en>.

- v. in the event that you express an interest for the initiatives or services offered by the companies of the Group, **allow** the Data Controller, to share your Data with the aforesaid companies in order to allow the conclusion of the deal.

### **4. The legal basis for the Processing of Personal Data**

Before we proceed, we would like to explain you in clear and plain language what a "legal basis" means.

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# Palladium Group of Companies GEIE

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As a rule, Personal Data may not be used by anyone (otherwise it would not be personal). There are, however, some cases in which the legal system allows processing: if, for example, the User requests information on initiatives of the Group or other Group companies, and contact us through telephone, e-mail, personally or postal mail, your data will be used to fulfil such request. In situations of this kind, the Data Controller acts on a valid legal basis, and can therefore legitimately process Personal Data.

In the present case, purposes referred to in points (i) and (ii) sub § 3 are carried out for the execution of pre-contractual measures or for the provision of a service expressly requested by you. This is the case, for example, when you contact us to obtain information on our initiatives and services.

Processing under point (iii) sub § 3 can be only pursued with your free, informed, specific, unequivocal and always revocable consent. In other words, The Controller or any other entity within the Group may not and will not send you offers and other commercial suggestions without your permission.

With regard to the purpose mentioned in point (v) sub § 3, the Data Controller refers to Recital no. 48 of the Regulation according to which companies that are part of a group "may have a legitimate interest in transmitting personal data within the group of undertakings for internal administrative purposes". Consequently, this purpose will be pursued through the legal basis of the legitimate interest of the Data Controller.

## 5. Modalities, places and times of the processing

The processing of data is carried out under the principles of lawfulness, necessity and relevance with the help of electronic and/or automated means.

Processing is carried out directly at Palladium Group EEG offices or by external parties, normally belonging to the Group, that we may appoint for managing our website. We may also ask service companies, professionals and consultants to carry out a part of the Data processing. In any case, such parties are bound to the Controller through a specific act of appointment as external Data Processor. Such act obliges third-parties to comply with the standards imposed by the Regulation, so that your Data is safe. The list of all the subjects involved in the Processing can be requested to the Data Controller at any time.

Your Personal Data will be processed by the Data Controller for the time necessary to achieve the purpose referred to in § 3 (i-iii) of this notice, as indicated in Recital 39 of the Regulation, without prejudice to a further period of retention that may be imposed or permitted by law as also provided for in Recital 65 of the Regulation.

The processing carried out to achieve the purposes referred to in point (iv) of § 3 will take place until you communicate your intention to withdraw your consent. If consent is revoked, the Data Controller will cease processing your personal data for such purposes.

## 6. Data Communication

The Data Controller may communicate your Data for the Purposes referred to in § 3 [**with particular regard to point (v) above**] to other companies of the Palladium Group, also vested as Data Controller, for the administrative management of requests, booking of appointments, assistance and/or commercial information to the interested party, IT companies and system security companies.

Your Data will not be disclosed otherwise.

## 7. Rights of the Data Subject

The Regulation grants you the right to:

1. access and obtain the correction or updating of inaccurate Data;
2. obtain the cancellation of Data processed unlawfully or unnecessarily with regard to the purposes for which the Data were collected and processed. The request for removal may not be granted when the processing is necessary to fulfil a legal obligation or exercise a legal right of the Controller or other legal entities within the Group;
3. obtain the limitation of the processing of Data if the accuracy of the Personal Data is contested, and only for the period necessary for us to verify whether the conditions set out in point 1 and 2 above are met;
4. receive Data about themselves in a commonly used and machine-readable form;
5. object to the processing for reasons related to the particular situation of the data subject. However, you are aware that we may continue to process your Data if we can prove that legitimate reasons for continuing the processing still exist, and only if such reasons prevail over your rights, interests and freedoms (for example, when we need Data to ascertain, exercise or defend a right in court. The Data Subject may also object to the Processing of Data for direct marketing purposes including profiling to the extent that it is connected to such direct marketing;

# Palladium Group of Companies GEIE

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6. request not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning the data subject except in cases where profiling is necessary for the conclusion or performance of a contract;

7. file a complaint with the supervisory authority.

## **8. Data Controller and Data Processor**

To exercise your rights as identified above, or for any request regarding the Processing of Your Personal Data, please feel free to contact the Data Controller using the following contact information:

**Palladium Group of Companies GEIE**, with registered office in 5, Rue de Bonnevoie L-1260 Luxembourg; e-mail: [eeig@palladium-group.com](mailto:eeig@palladium-group.com)

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