PRIVACY POLICY ON THE PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH ARTICLES 13-14 OF REGULATION (EU) 2016/679

With this document made pursuant to Regulation (EU) 2016/679 (hereinafter "GDPR") and the current legislation on the protection of personal data, **Acquatica Milano S.r.l.**, wishes to inform visitors ("Data Subjects") of this website ("Website") with respect to the purposes and methods of the processing of personal data ("Personal Data") collected through the different features and services available on the Website.

1 Data controller

Acquatica Milano S.r.l., with registered office at Via Edmondo De Amicis 7 (MI), is the Data Controller.

Acquatica Milano S.r.l. can be reached at the following e-mail address . privacy@acquaticapark.it

© Purpose and legal basis for processing

Personal Data is processed for the following purposes:

- Navigation on the Website: the processing of Personal Data is necessary to enable the Data Subject to properly navigate the Website. The legal basis is legitimate interest, pursuant to Article 6(1)(f) of the GDPR.
- Contractual fulfillment: the processing of Personal Data is necessary for the purchase of the ticket and/or subscription or the conversion of the coupon. The legal basis is the execution of pre-contractual or contractual measures, as referred to in Article 6. par. 1(b) of the GDPR. The provision of data is optional but necessary in order for the contract for the purchase or use of the promotional title to be finalized. Refusal will result in the inability to purchase the admission ticket or correctly convert the coupon.
- Accounting and tax compliance: the processing of Personal Data is necessary for the fulfillment of obligations under accounting, tax and administrative regulations, related and instrumental to the management of the admission and/or promotional ticket. The legal basis is the fulfillment of a legal obligation to which the Data Controller is subject, pursuant to Article 6(1)(c) of the GDPR.
- **Proper fulfillment of the Data Subject's requests**: the processing of Personal Data is necessary to follow up on the requests made by the Data Subject through the contact channels made available by the Data Controller in the "Contact" section. The legal bases are respectively, and depending on the case at hand, the consent of the Data Subject, pursuant to Article 6(1)(a) of the GDPR and/or the performance of a contract or pre-contractual measure, pursuant to Article 6(1)(b) of the GDPR.
- Management of spontaneous applications: the processing of Personal Data is necessary to evaluate the application for any open job positions and the proper management of the same. The legal basis is the consent of the Data Subject, pursuant to Article 6(1)(a) of the GDPR.
- Marketing activities: Personal Data will be processed, after obtaining the explicit consent of the Data Subject, for marketing and promotional purposes, via e-mail. The legal basis is the consent of the Data Subject, pursuant to Article 6(1)(a) of the GDPR.
- **Protection of rights and legal obligations**: Personal Data may be processed, where necessary, to enable the Data Controller to ascertain, exercise or defend one of its rights in or out of court, as well as to comply with legal obligations or requests from competent

authorities. The legal bases are, respectively, the fulfillment of a legal obligation to which the Data Controller is subject, pursuant to Art. 6(1)(c) and, where applicable, is legitimate interest, pursuant to Art. 6(1)(f) of the GDPR.

Types of Personal Data Processed

The Personal Data processed are as follows:

- **Browsing data**: IP address;
- **Identifying data**: first name, last name, TIN., residential address, as well as any additional information spontaneously shared by the Data Subject, e.g., in the "Contacts" section or in the "Work with Us" section;
- Child's data: first and last name:
- Contact information: e-mail address;
- **Purchase and billing functional data:** bank details where provided, VAT number, tax code, billing address and recipient code.

22 Categories of Data Subjects

Processing activities are aimed at the following categories of data subjects:

- Interested parties as Website visitors, buyers, consumers, potential employees/collaborators
- Minors

Processing methods and storage time

Personal Data will be processed using both paper and electronic methods, taking appropriate technical and organizational security measures to ensure data protection and prevent unauthorized access.

The data will be processed in accordance with current regulations, and the data will be retained for the time strictly necessary to ensure the proper fulfillment of contractual and legal obligations, and in any case, no longer than the period of navigation on the Website, the termination of the contractual relationship, the revocation of consent by the interested party and/or the proper processing of the request forwarded by the Interested Party.

Recipients of Personal Data

Personal Data may be shared with the following categories of parties:

- (a) authorized and properly trained staff of the Data Controller, including with respect to security measures and confidentiality obligations;
- b) external consultants that the Data Controller uses to perform the services offered on the Website, such as IT, legal, tax consultants, etc.
- (c) IT service providers (e.g., hosting services) used by the Data Controller in an avarious capacity and duly appointed as data controllers;
- (d) competent authorities or other entities stipulated by law.

Transfer of Personal Data outside the EU

Personal Data will not be transferred to third countries or international organizations.

Payments

The Website allows Data Subjects to make payments through external payment service providers, who act as autonomous controllers of Personal Data.

In particular:

- during the payment process, the user is redirected to platforms operated by payment providers (such as PayPal, Google Pay, or banking institutions);
- the Website does not process or store banking or payment instrument data (such as credit card numbers, security codes, or IBANs);
- Payment providers collect and process the necessary data in accordance with their privacy policies, which you are encouraged to review at the time of the transaction.

Rights of the Data Subject

In connection with the processing operations described in this Notice, the Data Subject may exercise the rights enshrined in Articles 15 to 22 of the GDPR, and in particular the following rights:

- **Right of Access** (Art. 15 GDPR): the right to obtain confirmation that Personal Data concerning the Data Subject is or is not being processed and, if so, to obtain access to the Personal Data.
- **Right of rectification** (Art. 16 GDPR): right to obtain without undue delay the rectification of inaccurate Personal Data concerning the Data Subject and/or the integration of incomplete data.
- **Right to erasure** (right to be forgotten) (Art. 17 GDPR): right to obtain the erasure of Personal Data concerning the Data Subject, unless the processing is necessary to comply with a legal obligation.
- **Right to restriction of processing** (Art. 18 GDPR): right to obtain restriction of processing in case of inaccuracy of data or for other legitimate reasons.
- **Right to data portability** (Art. 20 GDPR): right to receive Personal Data in a structured, machine-readable format.
- **Right to object** (Art. 21 GDPR): right to object, at any time, to the processing of Personal Data for legitimate reasons.
- Automated individual decision-making (Art. 22 GDPR), including profiling.
- **Right to file a complaint** with the Data Protection Authority (www.garanteprivacy.it).

To exercise these rights, you can contact the Data Controller at the following contact details:

- e-mail: <u>privacy@acquaticapark.it</u>