

**A. About us and the reason you are receiving this document**

The Mondadori Group, a corporate group formed by parent company Arnoldo Mondadori Editore S.p.A. and its subsidiaries, pursuant to and for the purposes of article 2359 of the Italian Civil Code ("**Mondadori Group**"), has always considered the personal data protection of its customers and/or potential customers and users to be of fundamental importance, ensuring that the processing of personal data, performed in any way, whether automated or manually, takes place in full compliance with the protections and rights recognised under Regulation (EU) 2016/679 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, as well as on the free movement of such data ("**Regulation**") and by additional applicable rules on personal data protection.

The wording personal data is defined in article 4(1) of the Regulation i.e., "... means any information relating to an identified or identifiable natural person (*"Data Subject"*); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person" ("**Personal Data**").

The Regulation provides that, prior to the Personal Data processing - this term understood as having the meaning in the definition shown in article 4(2) of the Regulation, "*processing*" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction" ("**Processing**") - it is necessary that the person to whom such Personal Data belong is informed about the reasons why such data are required and how they will be used.

With this purpose in mind, this document intends to provide you, in a simple and straightforward manner, with all useful and necessary information, so that you may provide your Personal Data in an aware and informed manner and, at any time, request and obtain clarification and/or corrections.

This privacy policy, therefore, has been prepared based on the principle of transparency, and includes all information required by article 13 of the Regulation and it is divided into individual sections ("**Sections**" and individually "**Section**") each of which deals with a specific topic to make reading faster, more straightforward and easier to understand ("**Privacy Policy**").

If necessary, this Privacy Policy may also include a specific form, where you will be asked to give your consent, as provided under article 7 of the Regulation, worded according to any additional type of use we intend to make of your Personal Data.

**B. Who will process your Personal Data?**

The company that will process your Personal Data for the main purpose referred to in Section 4 of this Privacy Policy and which, therefore, will act as controller, according to the definition in article 4(7) of the Regulation, "*controller means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data*", is:

**D Scuola S.p.A.**, with registered office in Via Bianca di Savoia 12, 20122 – Milan, registered with the Milan-Monza-Brianza-Lodi Companies Register, Tax code no. 01792180034 and VAT no. 01792180034

("Controller").

**C. Who can you contact?**

The Controller may be contacted through the following channels:

- By writing to the Mondadori Group Privacy Office at parent company Arnoldo Mondadori Editore S.p.A., Via Mondadori 1, 20090 – Segrate (Milan).

- By sending an e-mail to the e-mail address: [deascuola.privacy@deascuola.it](mailto:deascuola.privacy@deascuola.it) to the attention of the Mondadori Group's Privacy Office.
- By calling the telephone number +39 02 75421 and asking for the Mondadori Group Privacy Office.

At any time, you may consult the "Privacy" section of the Websites (as defined further on) where you will find all relevant information concerning the use and processing of your Personal Data and an updated list of contacts and communication channels made available to all Data Subjects by the Controller.

**D. What are the main purposes for processing your Personal Data?**

The websites of the Controller for which this Privacy Policy has been issued are those listed in the Mondadori Group Privacy Policy available at the link: [www.gruppomondadori.it/privacy-policy](http://www.gruppomondadori.it/privacy-policy) ("**Websites**"). The Controller, to enable you to register on the Websites, wherever there is the option of registering, and/or sending requests for information using the contact forms and/or subscription to the newsletter service, needs to collect certain Personal Data from you, as requested in the registration form to the Websites or other forms on the Websites. The Processing of your Personal Data will be performed by the Controller to enable you to access your profile, take part in events promoted through the Websites, receive newsletters, send requests for information, as well as taking advantage of all other services, from time to time, offered by each of the Websites for which you have registered and/or on which you are browsing; the Processing of your Personal Data will be lawfully based on the contractual relationship that will be created between you and the Controller as a result of your acceptance of the terms and conditions for using the Websites.

In addition, the Controller may process your Personal Data to comply with legal obligations and respond to requests from the competent authorities. In this case, Processing of your Personal Data will be based on performance of legal obligations by the Controller.

The Controller may also disclose or otherwise process your Personal Data within the context of extraordinary operations, transfers of contract, company or business line, reorganisations and corporate restructuring to conclude and manage such operations or to perform its contractual obligations deriving therefrom. In this case, the Processing of your Personal Data will be lawfully based on the legitimate interest of the Controller for performing such operations.

In addition, the Controller may process your Personal Data to ascertain, exercise and defend its rights in court. Said Processing will be lawfully based on the legitimate interest of the Controller to protect its rights.

To enable the Data Controller to perform Processing activities for the preceding purposes, it will be necessary to provide the Personal Data marked with the symbol \* (asterisk). Whenever you fail to provide any required information marked by an \*, it will not be possible to proceed with Processing your Personal Data and, consequently, you will not be allowed to complete your registration on the Websites and/or benefit from the services provided by them for which providing your Personal Data is required. Personal Data requested from you for the pursuit of said purposes will be those shown in the registration and/or contact form, that is, including, but not limited to: first name, last name, e-mail address and land line/mobile telephone numbers.

Whenever you decide to access the Websites through your social media profile (e.g., Facebook, Google, Twitter profile) where applicable, the collection of your Personal Data will be performed by the Controller from third parties, i.e., from the operator of the social media network you used to access the Websites.

However, you will be able to view this information in the Privacy section of each of the Websites.

**E. Additional purposes**

The Controller may request from you, in addition to the Personal Data referred to above, further Personal Data such as, including, but not limited to, data concerning your tastes, preferences, habits, needs and usage choices. The provision of such Personal Data is optional and if you decide not to provide such data, it will not affect registration on the Websites and the option of sending requests or using the services offered by the Websites.

Subject to your express, free and unambiguous consent, pursuant to article 6(1)(a) of the Regulation or, as specified further on, based on the legitimate interest, the Controller may process your Personal Data for the following purposes:

- (i) **Direct marketing purposes:** this term means the intention of the Controller to undertake promotional and/or marketing activities addressing you as the recipient. All activities performed to promote products, services, sold and/or provided based on the legitimate interest in pursuing their corporate purpose fall within this category.
- (ii) **Indirect marketing purposes:** this term means the intention of the Controller to undertake promotional and/or marketing activities on behalf of others addressing you as the recipient. This category shall include all activities implemented to promote products, services, sold and/or provided by third parties with whom the Controller has legal relations, in this case, with no data disclosure.
- (iii) **Profiling purposes:** this term means the Controller intends to profile you or evaluate your tastes, preferences and usage habits, also linked to market surveys and statistical analytics. This category covers any form of automated Processing of Personal Data to assess certain personal aspects, including, but not limited to, professional performance, economic situation, personal preferences, interests, reliability, behaviour, location, or movements.

The Processing of your Personal Data for the purposes referred to in (ii) and (iii) may not be undertaken without obtaining your consent, which needs to comply with the conditions set out in article 7 of the Regulation, thus determining the lawfulness of the Processing of your Personal Data.

Regarding the direct marketing purpose referred to in (i), it should be noted that, under article 6(1)(f) of the Regulation, the Controller may engage in such activity based on its legitimate interest, regardless of your consent and, up to such time that you object to such Processing, as better explained in Recital 47 of the Regulation, where it states, [it is] *"considered legitimate interest to process personal data for direct marketing purposes"*. This will also be possible as a result of the assessments made by the Controller regarding any prevalence of your interests, rights and fundamental freedoms on the protection of Personal Data on its legitimate interest in sending direct marketing messages.

The contact methods aimed at direct, indirect and profiling marketing activities, as in preceding (i), (ii) and (iii), may be either automated (e-mail, SMS, MMS, fax, telephone without operator) or traditional (telephone calls with operator and postal mail items). However, and as better specified in Sections H and I further on, you may object to Processing and/or withdraw your consent, also in part, for example, by consenting only to traditional contact methods.

Regarding the contact methods that involve the use of your telephone contact numbers, we remind you that the direct marketing activities undertaken by the Controller will be performed after checking whether your name is recorded in the Objection Register, as established pursuant to and for the purposes of Presidential Decree no. 178 of 7 September 2010, as amended.

#### F. To which parties may your Personal Data be disclosed?

Your Personal Data may be disclosed to specific parties considered recipients of such Personal Data. In fact, article 4(9) of the Regulation defines the recipient of Personal Data as *"the natural or legal person, public authority, agency or other body to which personal data are disclosed, whether a third party or not"* (**"Recipients"**).

Regarding this aspect and to correctly perform all required Processing activities for the purposes shown in this Privacy Policy, the following Recipients may be involved in processing your Personal Data:

- Third parties who perform part of the Processing and/or activities connected and instrumental thereto on behalf of the Controller. Such parties have been appointed as processors, this term meaning, according to the definition in article 4(8) of the Regulation *"the natural or legal person, public authority, agency or other body that processes Personal Data on behalf of the Controller"* (**"Processor"**).
- Individuals, employees and/or co-workers of the Controller, who have been entrusted with specific and/or additional processing activities on your Personal Data. Such individuals have been given specific instructions regarding the security and correct use of Personal Data and are defined, in accordance with Article 4(10)

of the Regulation, *"persons authorised to process Personal Data under the direct authority of the Controller or the Processor"* (**"Authorised Persons"**).

- Third parties who carry out processing activities and/or activities related and instrumental thereto as independent controllers, including, but not limited to, consulting companies, freelancers, credit institutions, insurance companies and third-party companies and/or members of the Mondadori Group.

Whenever required by law or to prevent or suppress the commission of a crime, your Personal Data may be disclosed to public bodies or to the judicial authorities without such parties being defined as Recipients. Moreover, in accordance with article 4(9) of the Regulation *"public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients"*.

#### G. For how long will your Personal Data be processed?

One of the principles applicable to the Processing of your Personal Data concerns limits on retention period, governed by article 5(1)(e) of the Regulation that states *"Personal Data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the Data Subject"*.

Considering this principle, your Personal Data will be processed by the Controller only for the time necessary for pursuit of the purposes set out in Section D of this Privacy Policy. Specifically, your Personal Data will be processed for a period corresponding to the minimum necessary, as stated in Recital 39 of the Regulation, i.e., until termination of the contractual relationships between the Data Subject and the Controller, without prejudice to an additional retention period that may be imposed by law, as also provided under Recital 65 of the Regulation.

In relation to the processing activities performed to achieve the purposes set out in Section E of this Privacy Policy, the Controller may lawfully process your Personal Data until you notify your intention to withdraw your consent to one or all the purposes for which you have been asked to provide it, using one of the methods shown in this Privacy Policy. Any withdrawal of your consent will require the Controller to cease the processing of your Personal Data for such purposes.

#### H. Is it possible to withdraw the consent you have given and how can you do this?

As provided in the Regulation, where you have given consent to the Processing of your Personal Data for one or more purposes for which it was requested, you may withdraw your consent at any time, in whole or in part, without prejudice to the lawfulness of consent-based Processing given prior to withdrawal.

The methods for withdrawing consent are very straightforward and user-friendly: simply contact the Controller using the contact channels shown in Section C of this Privacy Policy.

In addition to the above, and for simplicity, whenever you receive advertising e-mails from the Controller that you are not interested in, simply click on the unsubscribe button placed at the bottom of the message if you no longer want to receive any messages. You may also do this through additional contact channels for which you gave your consent (SMS, MMS, paper mail, fax and phone calls).

#### I. What are your rights?

As provided by the Regulation, you may exercise the following rights, in respect of the Controller, at any time:

- **Right of access** : you will have the right, in accordance with article 15(1) of the Regulation, to obtain from the Controller confirmation that Processing of your Personal Data is in progress and, in this case, to obtain access to such Personal Data and to the following information: a) the purposes of the Processing; b) the categories of Personal Data in question; c) the Recipients or categories of Recipients to whom your Personal Data have been or will be disclosed, specifically, whether Recipients are from third countries or international organisations; d) where possible, the planned retention period of Personal Data or, whenever this is

not possible, the criteria used to determine such period; e) the existence of the right of the Data Subject to request the Controller to rectify or delete Personal Data or limit the Processing of Personal Data concerning the Data Subject in question or to object to their Processing; f) the right to lodge a complaint with a supervisory authority; g) whenever Personal Data are not collected from the Data Subject, all available information on their origin; h) the existence of an automated decision-making process, including profiling referred to in article 22(1) and (4) of the Regulation and, at least in such cases, significant information on the logic used, as well as the importance and expected consequences of such processing for the Data Subject. All such information may be found in this Privacy Policy, which will remain indefinitely accessible in the Privacy section of the Websites.

- **Right of rectification:** you may obtain, in accordance with article 16 of the Regulation, rectification of your Personal Data that is inaccurate. Considering the purpose of the Processing, moreover, you may obtain supplementation of your Personal Data, which are incomplete, by providing a supplementary statement.
- **Right to erasure:** you may obtain, in accordance with article 17(1) of the Regulation, erasure of your Personal Data without undue delay and the Controller will be required to erase your Personal Data, in the case of any one of the following reasons: a) the Personal Data are no longer necessary with respect to the purposes for which they were collected or otherwise processed; b) you have withdrawn consent on which the Processing of your Personal Data is based and there is no other legal basis for Processing of your Personal Data; c) you have objected to the Processing, pursuant to article 21(1) or (2) of the Regulation and, in the case referred to in (1) any prevailing legitimate reason to proceed with the Processing of your Personal Data no longer exists; d) your Personal Data have been unlawfully processed; e) it is necessary to delete your Personal Data to comply with a legal obligation under a European Union or national law.  
In certain cases, pursuant to article 17(3) of the Regulation, the Controller shall be entitled not to erase your Personal Data, whenever their Processing is necessary, for example, for exercising the right to freedom of expression and information, for statutory compliance, for reasons of public interest, for purposes of archiving in the public interest, for scientific or historical research or for statistical purposes and for the assessment, exercise or defence of a right in court.
- **Right to restrict processing:** you may obtain restriction on Processing, in accordance with article 18 of the Regulation, whenever one of the following cases shall occur: a) you have challenged the accuracy of your Personal Data (the restriction will last for the time necessary for the Controller to verify the accuracy of such Personal Data); b) the processing is unlawful but you have opposed the deletion of your Personal Data requesting, instead, that its use be restricted; c) although the Controller no longer needs them for the purposes of processing, your Personal Data are used for the establishment, exercise or defence of a right in court; d) you have opposed the Processing pursuant to article 21(1) of the Regulation, and you are awaiting the outcome of verification regarding any prevalence of the legitimate reasons of the Controller with respect to your own.  
In the case of restriction of Processing, your Personal Data will be processed, subject to your consent for storage, or for the assessment, exercise or defence of a right in court, or to protect the rights of another natural or legal person or for reasons of significant public interest. We shall inform you, in any event, before such restriction is cancelled.
- **Right to data portability:** you may, at any time, request and receive, in accordance with article 20(1) of the Regulation, all your Personal Data processed by the Controller in a structured, commonly used and legible format or request that they be sent to another controller without hindrance. In this case, it is your responsibility to provide us with the exact details of the new controller to whom you wish your Personal Data to be transferred, by supplying us with a written authorisation.
- **Right to object:** pursuant to article 21 of the Regulation, you may object, at any time, to the Processing of your Personal Data a) if they are processed for direct marketing purposes, including profiling, to the extent that they are related to such direct marketing, or b) for reasons regarding your particular situation, whenever your Personal Data are processed based on the legitimate interest of the Controller or third parties, unless there are compelling lawful reasons to proceed with the Processing that

prevail over your interests, rights and freedoms or Processing is necessary for the establishment, exercise or defence of a right in court.

To exercise all your rights as identified above, simply contact the Controller in the manner shown in Section C of this Privacy Policy.

In addition, you have the right to lodge a complaint with the supervisory authority: without prejudice to your right to lodge an appeal before any other administrative or judicial venue, whenever you believe that the Processing of your Personal Data performed by the Data Controller has been done in breach of the Regulation and/or applicable legislation, you may lodge a complaint with the Supervisory Authority (*il Garante della Privacy*) for the Protection of Personal Data or another competent supervisory authority.

#### J. Where will your Personal Data be processed?

Your Personal Data will be processed by the Controller within the territory of the European Union.

Whenever, for technical and/or operational reasons, it is necessary to make use of entities located outside the European Union, we inform you that such entities will be appointed as, Processors pursuant to and for the purposes of article 28 of the Regulation, and transfer of your Personal Data to such entities, restricted to the performance of specific processing activities, shall be regulated in accordance with the provisions of Chapter V of the Regulation. Therefore, all necessary precautions will be taken to ensure the fullest protection of your Personal Data based on such transfer: (a) on adequacy decisions of the recipient third countries expressed by the European Commission; (b) on standard contractual clauses elaborated by the European Commission; (c) on the adoption of binding corporate rules, so-called *binding corporate rules*.

In all cases, you may request more details from the Controller whenever your Personal Data have been processed outside the European Union and ask for proof of the specific guarantees adopted.

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