

F A B R I C A

PRIVACY POLICY

1. WHO IS THE CONTROLLER OF THE PROCESSING OF YOUR DATA

The controller of the processing of your personal data is Fabrica Srl, with registered office at 1 via Villa Minelli, 31050, Ponzano Veneto (TV), Italy, email address: fabrica@fabrica.it, namely the company that owns the www.fabrica.it website.

You may contact the Data Controller by sending an email to the above address or by writing to Fabrica Srl, operational headquarters, 54/F Via Postioma, 31020 Catena di Villorba (TV), Italy, for the attention of the External Relations Office.

2. TYPE OF DATA

The data required may differ depending on the products, services or functionalities of the platform you wish to use, case by case, as indicated above.

Generally speaking, the data to be processed may be:

- personal identifying information of the user (such as first name, surname, date and place of birth, taxpayer's ID code, language and Country from which you have reached us, etc.);
- contact details (such as: e-mail address, telephone number, physical address, preferred delivery time, ...)
- transaction details (such as your payment details or information on your credit card, past purchases, orders, returns, etc.);
- connection, geolocation and browsing information (such as IP address, App. Mobile, cookies or similar technologies);
- information of commercial nature (such as subscription to a loyalty program, newsletter, etc.),
- information regarding tastes and preferences.

Depending on the services and/or functionalities requested, certain information may be mandatory insofar as required for the supply of the requested service or product or to allow access to the requested functionality.

Such information will therefore be required for the exact performance on our part of obligations under a contract, or to comply with obligations resulting by applicable laws or regulations.

Failure to supply such information might result in the impossibility for us to complete your registration as a user or for you to receive the relevant services or products or benefit from the requested functionality.

3. PURPOSES OF THE PROCESSING, LEGAL BASIS AND STORAGE PERIOD

Those indicated below are the purposes of the processing, the legal basis on which the processing of the information is based and the storage period of such information, depending on the types of

services and/or functionalities requested.

| PURPOSE | DESCRIPTION OF THE PURPOSES | LEGAL BASIS | STORAGE PERIOD |
|---|---|---------------------------------------|--|
| Performance and fulfilment of a contract for the purchase of goods and services | <p>Personal data are subject to processing in the following cases:</p> <ul style="list-style-type: none"> • Handling of payments • Handling of returns • Handling of requests for information regarding the availability of items or booking of products • Supply of educational, training and arts/communication services • Supply of sales documents and/or invoices relevant to transactions made • Implementing measures to detect and prevent possible frauds during purchase operations • Contacting a consumer for updates or communication of policies related to functionalities, or to products and services purchased | (Art. 6.1.b GDPR) | Up to 24 months from the signing of the contract |
| Fulfilment of requests received through the customer service channels | Your personal data will be processed to handle requests, deal with claims and product warranties, provide technical support via e-mail, telephone calls and social media. | Legitimate interest (Art. 6.1.f GDPR) | Only as long as necessary to handle the requests (and, however, for no longer than two years from receiving your request). |
| Marketing purposes | We will process your personal data to manage your subscription to the newsletter and to send you information | Consent (Art. 6.1.a GDPR) | 24 months from the date the marketing consent is given or the date of the last interaction with the |

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| | <p>on activities and projects of Fabrica and Colors.</p> <p>To inform you of competitions or of free, paid or funded training courses.</p> <p>You may at any time cancel your subscription to the Newsletter:</p> <ul style="list-style-type: none"> • Through the relevant link at the bottom of each newsletter; • By writing an email to fabrica@fabrica.it, • By submitting a request to the Contact center, phone number 0039 0422 519111. | | Controller (such as opening of an email sent by Fabrica). |
| Analysis of use of the platform and services to improve the user experience and our offer | Please note that when you access our digital properties, your browsing information and interactions with social media will be processed for analytical and statistical purposes, namely to understand how users interact with our platform and help us improve it. | Consent (Art. 6.1.a GDPR) | Until the browsing information is made anonymous |

4. SHARING OF INFORMATION WITH OTHER RECIPIENTS

For the purposes indicated in this policy, your personal data may be disclosed to third parties who cooperate with the Controller to provide the services. These latter will be duly appointed as data processors or persons in charge of the processing, and include:

- a) Financial institutions and companies specializing in online payments as well as in detecting and preventing frauds.
- c) Suppliers of technological services.
- d) Suppliers and collaborators for logistic, transport and delivery services.
- e) Suppliers of services related to customer support.
- f) Suppliers, collaborators and partners of marketing and communication services.

Moreover, for all purposes indicated in the policy, your data may be transferred abroad, both within and outside the European Union, always in compliance with all rights and guarantees under the applicable legislation and after verifying that an adequate level of protection is ensured by the relevant Third Country.

Lastly, your data will be processed by internal staff of the Controller's departments, suitably instructed, who will act as persons authorized for the processing of personal data.

5. YOUR RIGHTS AS DATA SUBJECT

We inform you that you are entitled to obtain from the Data Controller access to your personal data, rectification of inaccurate data or the erasure or restriction of processing, when the relevant conditions are met, as well as to object to your data being processed for legitimate interests of our Company. You also have the right to data portability with respect to the information provided, only if such information is subject to automated processing based on your consent or on a contract.

Moreover, you are entitled at any time to withdraw your consent to the processing for purposes that require such consent; however, the lawfulness of the processing carried out before such withdrawal will remain unprejudiced.

You may exercise the above rights by contacting the Controller using the contact details indicated in point 1, stating the reason of your request and the right you wish to exercise. If deemed necessary for identification purposes, you may be requested to provide a copy of a document proving your identity.

Please note that if you have subscribed to the services as a user, you may also visit the section relevant to the personal details of your account and modify or update them. In any event, consider that in actively providing us with your personal data by any means, you guarantee that they are true and accurate and agree to notify us of any changes in such data. The user will be solely liable for any loss or damage caused to the Controller or to a third party as a result of inaccurate, imprecise or incomplete information entered in the subscription forms. In general, you should only provide your own personal data, not any data of third parties, except for any provisions to the contrary contained in the privacy and cookie policy.

We also inform you that you have the right to lodge a complaint with the Data Protection Authority (www.garanteprivacy.it) to protect your personal data.

6. CHANGES TO THE POLICY

We may bring changes to the information contained in this policy whenever we deem it appropriate. Such changes will be communicated by various means (such as publication on websites, newsletters, through a banner, pop-up or a push notification), or otherwise by sending a specific e-mail if the change affects the purpose for which the data were collected, so that you will be able to examine the changes, make your own assessment and raise objections or cancel certain services or functions if you wish.

7. INFORMATION ON COOKIES

We use cookies and similar devices to improve your experience when browsing the Fabrica website, analyze the way in which you interact with us and, in certain cases, send you ads depending on your browsing habits. Please read our cookie policy thoroughly for more information on the cookies and similar devices we use, on their respective purposes and all other relevant information.

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