

**PRIVACY POLICY PRAGMA GROUP**  
**December 2025**

Gruppo Pragma s.r.l. ("Company"), as the operator of this Site, provides you with the following information regarding the processing of your Personal Data as a Visitor, pursuant to Article 13 of EU Regulation 2016/679 (the "GDPR").

**"Processing of Personal Data,"** simply put, is any operation involving any "information relating to an identified or identifiable natural person." For example, your first and last name, or an email address with a "username" that identifies you (e.g., mariorossi@...), is considered **"Personal Data,"** and the actions of collecting it, registering it with us, and using it to send you a communication are considered **"Processing"** operations; the same goes (for example) for communicating the Data to other organizations and archiving it.

Our organization is defined as the **"Data Controller"** as the entity that determines how and for what purposes to process information relating to natural persons.

You, as the **"natural person to whom the Personal Data refers,"** are defined as the **"Data Subject"** and have the right to receive information about who we are, what personal data we process, why, how, and for how long we process it, and what your obligations and rights are in relation to it.

The website of the Italian Data Protection Authority contains further useful information to better understand the topic (see for example: <http://www.garanteprivacy.it/home/diritti>).

Definitions of terms and expressions used are contained in the **Glossary** at the bottom of this page. For certain capitalized terms not defined here, please consult the glossary attached to the Terms and Conditions of Use of the Site. In the event of any conflicting definitions, for the purposes of this Privacy Policy, the definitions in the Glossary (at the bottom of the page) will prevail over those contained in the Terms and Conditions.

| <b>Who are we ("Data Controller")?</b>  |   |  |   |
|---|---|--|---|
| <b>Why do we process Personal Data (Purpose) and what is the basis for the Processing (Legal Basis) of each category of Data?</b> |   |  |   |
| <b>No.</b>  | <b>Purpose</b>  | <b>Categories of Personal Data</b>   | <b>Legal Basis</b>  |
| 1.  | Analyze traffic on the Site (e.g., detect the most visited pages, the number of visitors per time slot or day, geographic origin, average connection time, browsers used, visitor origin (from search engines or other sites), search phrases and words, etc.) to understand how it is used and manage, optimize, and | Browsing data, anonymous information (which does not allow us to trace your identity) and common Personal Data (e.g. complete IP | The necessity to make the Site available in accordance with the Terms of Use in force on the date of access to the same (Art. 6 § 1.b GDPR) |

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|  | improve it, or even just for statistical purposes; resolve operational problems (e.g., page loading anomalies); perform monitoring activities to repel and/or prevent cyber attacks and fraud; analyze user composition to improve the Site and/or Services.   | address)                             |   |
| 2.   | Fulfill Visitor requests regarding the Site and our activities, received by any means (e.g. via email)   | Common Personal Data                 | The necessity to adopt pre-contractual measures at the request of the Visitor (Art. 6 § 1.b GDPR)   |
| 3.   | Display the Site on the web, and carry out any consequent and/or related activities (e.g., implementing and maintaining personal data and archives, managing requests, sending technical, organizational, contractual, and informational communications; reporting on service disruptions; providing periodic reports on the content viewed; activating or expiring any premium services). | Common Personal Data                 | The necessity to make the Site available in accordance with the Terms of Use in force on the date of access to the same (Art. 6 § 1.b GDPR) |
| 4.   | Carry out commercial communications from the Company and on behalf of third-party partners ( <b>"Direct and Indirect Marketing"</b> ), including via the Newsletter, without transferring Data to such third parties   | Common Personal Data (email address) | The necessity to comply with the Terms and Conditions of the Newsletter Service (Article 6, Section 1.b of the GDPR)                        |
| <b>To whom do we disclose the Data (Categories of Recipients)?</b>   |  |                                      |   |
| <p>To the minimum extent necessary to achieve each of the Purposes, on the basis of the Applicable Law and/or a contractual agreement with the Data Controller, to:</p> <ol style="list-style-type: none"> <li>1. subjects necessary for the execution of the activities connected and consequent to the management of the Site, who act as Data Processors (e.g. IT service providers, etc.), obliged to maintain confidentiality and comply with the Privacy Law;</li> <li>2. subjects authorised by us (e.g. our employees), committed to confidentiality or subject to a legal obligation of confidentiality;</li> <li>3. consultants and/or professionals appointed by us, who may act as independent Data Controllers;</li> <li>4. external organizations</li> </ol> |  |                                      |   |

necessary for the performance of activities related to and resulting from the execution of the Terms of Use of the Site, who act as Data Processors or as independent Data Controllers (e.g. providers of IT, banking, insurance, shipping and transport, commercial agency, accounting, tax, legal, etc. services); 5. public organizations and Authorities, if and to the extent required by Applicable Law or by their orders, or for the exercise, ascertainment and/or defense of a right in court.

### **Do we transfer Personal Data outside the European Economic Area?**

For the management and storage of data and content on the Site, we and/or our suppliers may use services provided by companies established outside the European Economic Area (e.g., the United States; in this case, the transfer is carried out based on standard contractual clauses and additional measures to ensure data protection). Furthermore, the use of certain social media platforms connected to the Site involves the transfer of personal data outside the European Economic Area. In general, we ensure that data transfers only occur to countries that guarantee an adequate level of protection, for which an adequacy decision by the European Commission exists, or on the basis of one of the other guarantees provided for in Chapter V of the GDPR. Further information on transfers of personal data outside the European Economic Area (including references to the safeguards and the means to obtain information about them) is available by writing to the Company.

### **Do we perform automated decision-making and/or profiling activities?**

We do not carry out such activities.

### **How long do we keep the Data?**

The maximum retention period for the Personal Data of those who contact us for information or other preventive purposes will generally not exceed two years following the request. We process the Data for Direct and Indirect Marketing purposes until you unsubscribe from the Newsletter.

### **Are you obliged to provide us with Personal Data?**

Due to the way the Internet works, it is not possible to refuse the disclosure of Browsing Data; however, it is not possible to refuse the disclosure of certain Personal Data (such as the device's IP address). You are, of course, not obligated to write to us using the contact information on the "Contact Us" page, but if you wish, you must provide us with the Personal Data we request. You are not obligated to subscribe to the Newsletter, and you can unsubscribe at any time.

### **What happens if you refuse to provide your data?**

If you do not agree to share your Data, we will not be able to respond to requests you send to us using the contact information on the "Contact Us" page or by other means.

### **What rights do you have as a "Data Subject"?**

You, as the person to whom the data refers ("Data Subject"), have the right to: 1. access the data

held by the Data Controller, and request a copy thereof, except where the exercise of the right infringes the rights and freedoms of other natural persons; **2.** request the rectification of any incomplete or inaccurate data; **3.** request the erasure of your data, subject to the exclusions or limitations established by the Applicable Regulations (e.g. Art. 17 § 3 GDPR); **4.** request the restriction of processing, where the conditions are met and subject to the exclusions established by Art. 18 § 2 GDPR; **5.** request data portability (i.e., receive the data in a structured, commonly used and machine-readable format, so that it can be transmitted to another Data Controller without hindrance), to the extent that the processing is based on consent or the necessity for the performance of a contract, where technically possible and except where the exercise of the right would infringe the rights and freedoms of other natural persons; **6.** lodge a complaint with the Guarantor for the Protection of Personal Data (in Italy, [www.garanteprivacy.it](http://www.garanteprivacy.it)), or to the Data Protection Authority of the EU Member State in which you habitually reside or work, or of the place where the alleged violation occurred.

**Right to object:** You can object to the Processing referred to in the Newsletter Service for Direct and Indirect Marketing Purposes, upon simple request, even initially by sending an email to [privacy@gruppoebano.com](mailto:privacy@gruppoebano.com) or, subsequently, using the "Unsubscribe" or similar function present in each email received.

The exercise of the above rights may also be delayed, limited or excluded in the cases provided for by Art. 2-*undecies* of Legislative Decree 196/2003.

#### Who can you contact with questions or to exercise your rights?

You can send an email to [privacy@gruppoebano.com](mailto:privacy@gruppoebano.com), or by post to the address: Gruppo Pragma s.r.l., AREA Science Park - Padriciano 99 – Building E3 34149 Trieste. The Data Controller has also designated a Data Protection Officer ("DPO") who is available for any privacy-related requests at the following address: [dpo@gruppoebano.com](mailto:dpo@gruppoebano.com).

#### PLEASE NOTE:

1. The information provided here concerns exclusively the processing of Personal Data collected through this Site. If you engage with us in a relationship that goes beyond simple navigation of the Site and requesting information, you may be provided with additional and/or different information regarding the processing of your personal data.
2. This Privacy Policy is effective as of the date indicated in the header; we reserve the right to modify its content, in part or in full, even as a result of changes to the Privacy Law. We will publish the updated version of the Privacy Policy on the Website, and from that moment it will be binding: you are therefore invited to visit this section regularly.
3. We do not intentionally collect personal information from individuals who, under their national law, lack legal capacity to enter into contracts. If we have recorded information about such individuals, we will delete it promptly upon request of the data subject or their legal guardian.

#### GLOSSARY

**"Supervisory Authority"**: the independent public authority established by a Member State of the European Union, or by the European Union itself, responsible for monitoring the application of the Privacy Law (for Italy, the Guarantor for the Protection of Personal Data, <http://www.garanteprivacy.it>).

**"Authority"**: body or organization, public or private, with administrative, judicial, police, disciplinary, and supervisory powers.

**“Authorized”**: the natural person, placed under the direct authority of the Data Controller, who receives instructions from the latter on the Processing of Personal Data, pursuant to and for the purposes of Art. 29 of the GDPR.

**“Privacy Code”**: Legislative Decree 196/2003 and subsequent amendments and/or additions (in particular by Legislative Decree no. 101/2018).

**“Committee” or “EDPB”**: the European Data Protection Board, established by Article 68 of the GDPR and governed by Articles 68 to 76 of the GDPR, which replaces the WP29 as of 25/5/2018.

**“Communication”**: “the provision of personal data to one or more specific subjects other than the data subject, the representative of the controller in the European Union, the processor or his representative in the European Union, the persons authorised, pursuant to Article 2-*quaterdecies*, to process personal data under the direct authority of the controller or processor, in any form, including by making them available, consulting them or by interconnecting them” (as defined in Article 2-*ter*, paragraph 4, letter a of the Privacy Code).

**“Cookie”**: short fragments of text (letters and/or numbers) that allow the web server to store information on the browser to be reused during the same visit to the site (session cookies) or later, even after several days (persistent cookies). Cookies are stored, based on user preferences, by the individual browser on the specific device used (computer, tablet, smartphone). The following categories are considered:

- **Technical cookies**: these are cookies that are essential for the correct functioning of the site and are used for the sole purpose of *“carrying out the transmission of a communication over an electronic communications network, or to the extent strictly necessary for the provider of an information society service explicitly requested by the subscriber or user to provide that service”* (see Art. 122, paragraph 1, of the Privacy Code).
- **Analytical cookies**: These cookies are used to anonymously collect and analyze site traffic and usage. These cookies, even without identifying the user, allow us, for example, to detect whether the same user returns to the site at different times. They also allow us to monitor the system and improve its performance and usability. Disabling these cookies can be done without any loss of functionality.
- **Profiling cookies**: these are persistent cookies used to identify (anonymously or otherwise) user preferences and improve their browsing experience.
- **Third-party cookies (analytical and/or profiling)**: these are cookies generated by organizations not affiliated with the Site, but integrated into parts of the Site's pages. Examples include Google widgets (e.g., Google Maps) or social plugins (Facebook, Twitter, LinkedIn, Google+, etc.).

**“Browsing Data”**: this is data that the computer systems and software procedures used to operate the website acquire during their normal operation, and whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified data subjects, but by its very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes the IP addresses or domain names of the computers used by users connecting to the website, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc.), and other parameters relating to the user's operating system and IT environment. This data, necessary for the use of web services, is also processed for the following purposes: obtaining statistical information on the use of the services (most visited pages, number of visitors per time slot or day, geographical areas of origin, etc.); and monitoring the proper functioning of the services offered.

**“Personal Data”**: “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”, as defined in Article 4, subparagraph 1, no. 1, of the GDPR).

**“Recipient”**: “the natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not”, as defined in Art. 4, subparagraph 1, no. 9, of the GDPR.

**“GDPR”**: EU Regulation 2016/679 “on the protection of natural persons with regard to the processing of

personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)".

**“Data Subject”**: “identified or identifiable natural person”, as defined in Art. 4, subparagraph 1, no. 1, of EU Regulation 2016/679 (the “GDPR”).

**“Restriction”**: “the marking of stored personal data with the aim of limiting their processing in the future”, as defined in Art. 4, subparagraph 1, no. 3, of the GDPR.

**“Regulations” or “Law”**: one or more of the sets of rules referred to as the Privacy Policy and the Applicable Policy.

**“Applicable Regulations”**: any provision, of any rank, belonging to Italian law or to that of the European Union, in any way applicable to the Site and/or the Services.

**“Privacy Law”**: EU Regulation 2016/679 (“**GDPR**”), Legislative Decree 196/2003 and subsequent amendments and/or additions (“**Privacy Code**”), as well as the measures adopted by the Supervisory Authority in execution of the tasks established by the GDPR and the Privacy Code, and any other applicable legislation of any rank, including the opinions and guidelines developed by the Committee.

**“Profiling”**: “any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements”, as defined in Article 4, subparagraph 1, no. 4, of the GDPR.

**“Publication”**: the action by which the Controller communicates information on the Site, without implementing procedures that require the Visitor to view it.

**“Processor”**: “the natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller”, as defined in Article 4, subparagraph 1, no. 8, of the GDPR.

**“Third Party”**: “a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data”, as defined in Article 4, subparagraph 1, no. 10, of the GDPR.

**“Controller”**: “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”, as defined in Art. 4, subparagraph 1, no. 7, of the GDPR.

**“Processing”**: “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”, as defined in Article 4, subparagraph 1, no. 2, of the GDPR.

**“WP29”**: the Working Party on the Protection of Individuals with regard to the Processing of Personal Data, established pursuant to Article 29 of Directive 95/46/EC, whose tasks are set out in Article 30 of Directive 95/46/EC and Article 15 of Directive 2002/58/EC.