

PRIVACY POLICY

Veroniki Real Estate S.r.l. (hereinafter also just the "**Company**") firmly believes that transparency is the basis of the relationship with its customers and users. For this reason, he wants to apply the utmost clarity on how to use personal data. The methods for managing the website are described below, concerning the processing of the personal data of users who consult it. This is information that is also provided according to art. 13 of Regulation (EU) 2017/679 "Protection of individuals concerning the processing of personal data, as well as the free circulation of such data" (hereinafter also just "**GDPR**") to those who interact with the Company's web services, accessible electronically starting from the address <http://veronikirealestate.com> corresponding to the home page of the official website of the Company (hereinafter also just the "**Site**").

The Privacy Policy is also inspired by Recommendation no. 2/2001 that the European Authorities for the protection of personal data, gathered in the Group established by art. 29 of the directive n. 95/46 / EC, adopted on May 17, 2001, to identify some minimum requirements for the collection of personal data online, and, in particular, the methods, timing, and nature of the information that the Data Controllers must provide. to users when they connect to web pages, regardless of the purpose of the connection.

1. Personal data controller and Data Protection Officer

The data controller is the Company, with registered office in Via Larga 9, Milan (Italy) in the person of its pro tempore legal representative domiciled at the Company's registered office. The external managers to whom the data are communicated for the various processing purposes have been appointed. The complete list of data processing managers can be requested by contacting the Data Controller at the following addresses: by e-mail: privacy@veronikirealestate.it , by post: Veroniki Real Estate S.r.l. Via Larga 9 - 20122 Milan. According to art. 37 of the Privacy Regulation, the Company has also appointed a Data Protection Officer (so-called Data Protection Officer - "DPO"), who can be contacted at the following e-mail address: giacomo.cardani@dcpartners.it

2. Place of processing of personal data

The treatments connected to the web services of the Site take place at the headquarters of the Company in Via Larga 9, Milan, and are only handled by the technical staff of the office in charge of the treatment. For the various specific services, the related data are processed by specialized companies, appointed as Data Processors according to art. 28 of the GDPR.

3. Type of data processed

Navigation data The computer systems and software procedures used to operate the Site acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This is information that is not collected to be associated with identified interested parties, but which by their 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 who connect to the Site, 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 given by the server (successful, error, etc.) and other parameters relating to the operating system and the user's IT environment. These data are used for the sole purpose of obtaining anonymous statistical information on the use of the Site and to check its correct functioning and are deleted immediately after processing. The data could be used to ascertain responsibility in case of hypothetical computer crimes against

the Site. Data provided by the user. The optional, explicit, and voluntary sending of e-mails to the addresses indicated on the Site entails the subsequent acquisition of the sender's address,

necessary to respond to requests, as well as any other personal data included in the message. For some specific services, the release of personal data is required.

4. Purpose and legal basis of data processing

Without prejudice to what is specified for the navigation data referred to in point 2.1), the personal data provided by users through the Site are processed for the following purposes:

- a) allow the carrying out of operations strictly connected and instrumental to the management of relationships with users, such as - by way of example - the management for personnel selection purposes of the CV (curriculum vitae) and other relevant information sent by the user;
- b) allow the correct execution of the contractual obligations assumed by the Company towards users and customers and vice versa, as well as the consequent accounting and tax obligations;
- c) allow the fulfillment of the obligations established by laws, regulations, and community regulations, or provisions issued by authorities legitimated by the law and by supervisory and control bodies;
- d) purposes necessary to ascertain, exercise, or defend a right in court or whenever the judicial authorities exercise their judicial functions;
- e) purposes of statistical research/analysis on aggregated or anonymous data, therefore without the possibility of identifying the user, aimed at measuring the functioning of the Site and its operational functions, including the resolution of any technical problem.

The legal basis for the processing of personal data for the purposes referred to in point a) is the provision of a service or the response to a request, which does not require the consent of users, following applicable law.

As regards the purpose b) the processing is necessary for the execution of the existing contract with the Company, the purpose referred to in point c) has as the legal basis of the processing the fulfillment of legal obligations while the purpose referred to in point d) the pursuit of a legitimate interest of the Company. As regards the purpose referred to in point e), it does not involve the processing of personal data.

5. Links to other websites

The Veroniki Real Estate S.r.l. includes links to the websites of the other companies of the Veroniki Holding S.p.A. Group. These companies may collect information about the user when interacting with their content, their advertising, and their services.

6. Processing methods and storage times

Personal data are processed with automated tools for the time strictly necessary to achieve the purposes for which they were collected. Specific security measures are observed to prevent data loss, illicit or incorrect use, and unauthorized access.

7. Scope of communication and dissemination of data

For the pursuit of the aforementioned purposes, the personal data provided will be processed only by persons appointed by the Company, or employees, collaborators and internal and external consultants of the Company appointed in writing as internal and external persons in charge or managers of data processing and to whom they have been giving specific instructions for this purpose. The user's data may also be communicated and transferred to subjects whose right to access personal data is recognized by law and secondary legislation or provisions issued by authorities legitimated by the law. Finally, the user's data may be shared, used, and transferred within the companies belonging to the Veroniki Holding S.p.A. Group. about the purposes for which

the information was collected. These Parties ensure adequate protection of individuals concerning the processing of their data.

8. Rights of interested parties

The subjects to whom the personal data refer have the right at any time to obtain confirmation of the existence or otherwise of such data and to know its content and origin, verify its accuracy or request its integration or updating, or the rectification (Article 15 ss. GDPR). According to the same article, one has the right to request cancellation, transformation into anonymous form, or blocking of data processed in violation of the law, as well as to oppose in any case, for legitimate reasons, to their processing. Requests should be sent by e-mail, to the address: by e-mail: privacy@veronikirealestate.it , by mail: Veroniki Real Estate S.r.l. Via Larga 9 - 20122 Milan.

9. Changes

The Company reserves the right to modify the Privacy Policy at any time, also due to changes in the applicable legislation, by updating this page. The user is therefore required to periodically check the Privacy Policy to become aware of its updates.

This Privacy Policy Rev.00 was issued on 23/01/2019 and affects from the same day.