

INFORMATION FOR DACOM's CUSTOMERS

Version: 00 - 16/11/2021

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Information on processing of personal data for customers

Dear Customer,

Dacom Spa would like to provide you with some information on the processing of your personal data.

1. Purposes (and legal basis of processing)

The personal data you provide and that obtained from your browsing of our Websites will be used for the purposes of:

- a) providing the service of registration on the Website and the related services, preliminary to the stipulation of sales agreements, to process them up and to protect the resulting credit positions (implementation of the agreement between the parties);
- b) fulfilling operating, management, administrative and accounting requirements, including the possible transmission by email of trade invoices (in fulfilment of legal obligations, in particular having regard to tax);
- c) allowing access to and browsing on the Websites, to prepare anonymous statistics on their use, to monitor their functioning and to ascertain any liability in case of unlawful acts (in the lawful interest of Dacom);
- d) conducting marketing, commercial information and promotional activities for all Esprinet Group companies even based on profiling, including the sending of newsletters and advertising material, possibly through messaging applications. The profiling activities that will be carried out will be based on an analysis of browsing and purchasing behaviour and will be used for behavioural advertising (subject to explicit consent).

The provision of data for the contractual purposes referred to in points a), b) and c) is compulsory (in its absence it is not possible to process the sales agreement or provide of the relevant services).

For marketing purposes under point d) you will be asked to give your consent, without prejudice to the right of revocation at any time (without prejudice to the lawfulness of the previous processing).

2. Cookies

We use our own and third-party cookies on our website to speed up your navigation of the website, recommend products, and display content, including advertising, that is customized to your interests. If you would like to learn more about this information, please see our Privacy Policy located on the Dacom website.

3. Communication of data – Transfer of data abroad

Personal data collected may be communicated, according to specific competences, to public administrations, for the fulfilment of institutional functions, to banking institutions, to parties specialising in the management of information systems and/or of payment systems, insurance companies and credit intermediaries, to parties providing the goods and services offered by Dacom, to parties providing transport or delivery services, to parties used by Dacom to carry out promotional, advertising, marketing and communications activities, to law firms and consultants, to parties responsible for keeping accounts or auditing the Company's financial statements or to public authorities in compliance with the legislation.

Personal data shall not disseminated under any circumstances.

Within the limits strictly necessary for implementation of the contractual relations, your personal data may be communicated to third parties, such as by way of example, providers of products and/or services who may be located in or outside the European Union. The possible transfer of data outside the-EU is regulated by specific agreements that require the recipient to comply with the appropriate guarantees provided for by current legislation

4. General matters

The processing of your personal data may consist, in addition to their collection, in their recording, storage, modification, communication, cancellation in automated or semi-automated form and data may be stored in paper and/or electronic/electronic/informatics/optical form.

All personal data processed by Dacom are protected by adequate security measures, as provided for by current legislation and for the time strictly necessary to fulfil the purposes referred to in point 1.

For the purposes referred to in points a) and b) your data will be kept for the period provided by law.

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For the purposes referred to in point c) the data will be kept for 2 years.

For the purposes referred to in point d) the data will be kept until the revocation of consent or the termination of the contractual relationship.

Pursuant to art. 13 of the General Data Protection Regulation (GDPR) Regulation (EU) 2016/679, we recall that you have the right to request Dacom for access to your personal data, their rectification or deletion (where applicable) or limitation of their processing. You are also entitled to revoke the authorisation to process the data to which you consented, as well as the right to lodge a complaint with the Italian Data Protection Authority.

All the rights summarised above may be exercised by writing to the address: privacy@dacomaidc.com

We will respond promptly.

The Data Controller is Dacom Spa, in the person of its *pro tempore* legal representative, with registered office at Via Crocefisso, 5 – Milano, 20122.

Joint data controllers are companies in the Esprinet ¹group, with which the customer database is shared for the fulfilment of the above purposes.

Each company of the Esprinet Group, in the joint ownership agreement, is tasked to provide all interested parties with adequate information for the processing of personal data.

Dacom Spa is notably responsible for consistent and compliant management of consent given and for guaranteeing exercise of the foregoing rights.

Dacom can be contacted at all times for clarification at the following email address: privacy@dacomaidc.com

¹ <https://www.esprinet.com/en/group/structure-company/>