

INFORMATION ACT PURSUANT TO ARTICLES 13 AND 14 OF EU REGULATION 2016/679

- INSURANCE -

IMA ITALIA ASSISTANCE S.p.A., (Fiscal Code: 09749030152 – VAT n.: 13145490960) (hereinafter "IMA ITALIA"), in the person of its legal representative pro tempore, with registered office in Sesto S. Giovanni (MI), Piazza Indro Montanelli, 20, in its capacity as Data Controller ex art. 4 n. 7) and 24 of the EU Regulation n. 2016/679 (GDPR), informs, pursuant to art. 13 and 14 of the GDPR, that the personal data, described in art. 1, will be processed by IMA ITALIA for the execution of the processing purposes described in art. 2.

1. Category of personal data being processed

1.1. IMA ITALIA collects and processes, for the purposes of pursuing the processing purposes described in art. 2, the following information concerning, depending on the factual/contractual circumstances, mainly the following categories of data subject ex art. 4 n. 1) of the GDPR: insured (also policyholder); policyholder; beneficiary; family member/permittee of the insured/beneficiary¹; an animal subject to insurance protection; any other subject whose personal information could be processed, if necessary, for the performance of the insurance service:

- i. Personal data pursuant to art. 4 n. 1) of the GDPR so-called identification/contact data (e.g. first name; surname; date and place of birth; tax code; VAT number; address of residence/domicile/dormitory; telephone number; e-mail address; degree of relationship; information about the identity document (e.g. type and number of the document; date of issue; expiry date; place/body of issue; nationality); information on the vehicle subject to insurance protection (e.g. registration number plate; model/make; date of registration); insurance policy number; gender; identification information on the travel document; identification elements of the animal subject to insurance protection (e.g. microchip); including, bank/financial data (e.g. bank/post account number) and/or ubication/location; any other information, not described herein by way of example, directly or indirectly linked to the claim and/or to the insurance claim that has occurred/reported/communicated (e.g. telephone recording made with an operator acting on behalf of IMA ITALIA; recording of tele/video medical and/or veterinary consultations), in order to best provide the insurance assistance/coverage contractually agreed with IMA ITALIA; and, finally, any other information, not described herein by way of example, requested and/or entered into the mobile software application made available by IMA ITALIA (hereinafter only "**personal data**").
- ii. Particular personal data within the meaning of art. 9 paragraph 1) of the GDPR, processed, if necessary, following the correct, complete and timely management of a claim and/or a request for insurance assistance occurred/reported/reported, in order to provide, in the best way possible, the insurance assistance/coverage contractually agreed to with IMA ITALIA (e.g. information on the state of health or on the need for medical/health/healthcare services/assistance, including at home (e.g. hospitalisation; accident; illness; medical diagnosis/therapy; death; medical expenses) (hereinafter only "**particular personal data**").
- iii. Judicial personal data within the meaning of art. 10 of the GDPR, including any information about an active/passive and/or direct/indirect involvement in a civil/criminal/administrative judicial/legal dispute (hereinafter "**judicial personal data**").

Given the subjective and objective heterogeneity of the categories of personal information described above, IMA ITALIA points out, in this regard, that it will only process the personal information strictly necessary to perform each of the processing purposes described in art. 2 below, in accordance with the principles under art. 5 of the GDPR, and on the basis of the specific product/contract/insurance policy signed with IMA ITALIA. In accordance with art. 14 paragraph 2) letter f) of the GDPR, IMA ITALIA specifies that the origin of personal information, subject to processing, may possibly derive from the relevant business partner and/or third parties (public; private; publicly controlled) involved, directly or indirectly, in the execution and proper management of the insurance service. Lastly, IMA ITALIA specifies that the subjects, described in greater detail in art. 1.1. above, qualify as data subjects under art. 4 n. 1) of the GDPR, to which must be added, in this regard, any supplier/consultant who provides, directly or indirectly, a service of various kinds that is the subject of insurance protection.

2. Purpose of processing and legal basis.

2.1. Personal data and, if necessary and appropriate, particular personal data and/or judicial personal data are/can be processed by IMA ITALIA for the performance of the following processing purpose:

- a. Execution, also at a distance, of the (pre)contractual relationship/insurance policy, including the performance of any contractual/regulatory fulfilment connected, directly or indirectly, to the fulfilment of the relevant insurance relationship/purpose, including the possible use of the services made available by means of a specific mobile software application, subject to registration (e.g.: collection of premium; fulfilment of the insurance assistance/coverage/practice, including the management/liquidation of the relevant claim/event covered by the insurance cover; resolution of the insurance claim/event; resolution of the insurance claim/event. collection of the premium; completion of the management/payment of insurance assistance/coverage/practice, including the management/liquidation of the relevant claim/event subject to insurance cover; settlement of a dispute concerning the indemnity/payment of other benefits; customer due diligence, if necessary; prevention, detection and/or prosecution of insurance fraud; determination/assessment/management of an insurance risk; reinsurance; co-insurance; internal management activities within the business group of which IMA ITALIA is a member; recording of a tele/video medical and/or veterinary consultation; telephone recording with an operator acting on behalf of IMA ITALIA; e-call).

In compliance with art. 13 paragraph 2) letter e) of the GDPR, IMA ITALIA specifies that any failure to communicate (even partial, if necessary) personal data and, if necessary, particular personal data and/or judicial personal data may, if necessary, result in the impossibility for IMA ITALIA to perform, correctly and completely, the purpose of processing referred to in art. 2.1. letter a) above.

¹ For further information, IMA ITALIA refers, in its entirety, to the glossary/definition of the relevant condition of insurance issued by IMA ITALIA itself.

In compliance with art. 13 paragraph 2) letter c) of the GDPR (or in compliance with art. 14 paragraph 2) letter d) of the GDPR, if applicable), IMA ITALIA informs you of your right to revoke, at any time, any consent you may have given for the processing of particular personal data in order to execute the purpose of processing referred to in art. 2.1. letter a), through the use of contact details described in art. 7, without such an event affecting the lawfulness of the processing based on the consent provided before the revocation: taking this into account, IMA ITALIA specifies, however, that any lack of consent or any revocation of consent previously provided affects, without any doubt, the possibility for IMA ITALIA to implement, fully and completely, the processing purpose referred to in art. 2.1. letter a) (in particular, with regard to the execution of the insurance policy, including the management of the insurance assistance/coverage/practice, and the management/liquidation of the relevant claim/event subject to insurance cover).

In this regard, IMA ITALIA points out that the legal basis of the processing purpose referred to in art. 2.1. letter a) is to be found in the following legal provisions, in addition to Legislative Decree n. 209/2005: art. 6 paragraph 1) letters b) c) of the GDPR; art. 9 paragraph 2) letter a) of the GDPR; art. 4.7. of Recommendation R(2002)9 of the Committee of Ministers to member states on the protection of personal data collected and processed for insurance purposes, to be read in conjunction with Art. 10 of the GDPR, and Art. 2 octies paragraph 3) letter d) of the amended Legislative Decree n. 196/2003 (Privacy Code).

2.2. Personal data and, if necessary and appropriate, particular personal data and/or judicial personal data are/can be processed by IMA ITALIA for the performance of the following processing purpose:

- b.** Recognition/exercise/defence of a right/interest, including in court.

In this regard, IMA ITALIA specifies that the legal basis for the purpose of the processing referred to in art. 2.2. letter b) is to be found in the following regulatory provisions: art. 6 paragraph 1) letter f) of the GDPR; art. 9 paragraph 2) letter f) of the GDPR; art. 4.7. of Recommendation R(2002)9 of the Committee of Ministers to member states on the protection of personal data collected and processed for insurance purposes, to be read in conjunction with art. 10 of the GDPR, and art. 2 octies paragraph 3) letter e) of the Privacy Code. In compliance with art. 13 paragraph 1) letter d) of the GDPR (or in compliance with art. 14 paragraph 2) letter b) of the GDPR, if applicable), IMA ITALIA specifies that the legitimate interest pursued, if necessary and appropriate, through this purpose of processing, is to protect its rights/interests, even in court, in the face of potential (or alleged) conduct deemed unlawful/illegal.

2.3. Personal data are/can be processed by IMA ITALIA for the following purposes:

- c.** Handling/resolving/addressing a complaint;
- d.** Statistical activities, also aimed at improving knowledge of the insurance market;
- e.** Verification of the quality of the services offered (customer satisfaction), by means of a special questionnaire/interview.

In this regard, IMA ITALIA specifies that the legal basis for each processing purpose referred to in art. 2.3. is found in the following specific regulatory provisions: for the execution of the processing purpose referred to in art. 2.3. letter c): art. 6 paragraph 1) letter c) of the GDPR, to be read, in conjunction with (also by analogy, if necessary), ISVAP Regulation n. 24 of 19.5.2008; for the execution of the processing purpose referred to in art. 2.3. letter d): art. 6 paragraph 1) letters c) f) of the GDPR, to be read, in conjunction with (also by analogy), IVASS Regulation n. 36 of 28.2.2017; for the processing purpose referred to in art. 2.3. letter e): art. 6 paragraph 1) letter f) of the GDPR.

In compliance with art. 13 paragraph 1) letter d) of the GDPR (or in compliance with art. 14 paragraph 2) letter b) of the GDPR, if applicable), IMA ITALIA specifies that the legitimate interest pursued through the processing purpose described in art. 2.3. letter d) is to improve and deepen knowledge of the insurance market; on the other hand, the legitimate interest pursued through the purpose of processing described in art. 2.3. letter e) is to understand any areas/areas for improvement in the services provided and, then, to produce a report on behalf of IMA ITALIA and/or its business partner.

2.4. Personal data are/can be processed by IMA ITALIA for the following purposes:

- f.** Advertising/promotional/commercial activities (including market research) of one or more insurance products, to be carried out, in compliance with the principles/prescriptions under art. 182 of Legislative Decree n. 209/2005, directly or through intermediaries, by automated/electronic/telematic means (e.g. e-mail; newsletter).

In compliance with art. 13 paragraph 2) letter c) of the GDPR (or in compliance with art. 14 paragraph 2) letter d) of the GDPR, if applicable), IMA ITALIA informs you of your right to withdraw, at any time, any consent you may have given for the processing of your personal data in order to carry out the purpose of the processing described in art. 2.4. letter f), through the use of the contact data described in art. 7 below, without this event affecting the lawfulness of the processing based on the consent you gave before such withdrawal.

In this regard, IMA ITALIA specifies that the legal basis of the processing purpose referred to in art. 2.4. letter f) is found in the following regulatory provisions: art. 6 paragraph 1) letter a) of the GDPR, to be read, together with art. 82 and 83 of IVASS Regulation n. 40 of 2.8.2018, and art. 4.8. of Recommendation R (2002)9 of the Committee of Ministers to Member States on the protection of personal data collected and processed for insurance purposes.

3. Retention period.

3.1. In accordance with art. 13 paragraph 2) letter a) of the GDPR (or in accordance with art. 14 paragraph 2) letter a) of the GDPR, if applicable), IMA ITALIA communicates the following retention periods/criteria, after which the personal data and/or particular personal data and/or any judicial personal data will be subject deletion, destruction or anonymisation, unless further storage is necessary in order to comply with a legal/regulatory obligation or in order to protect/establish a right/interest, including in court: **(i)** for the performance of the processing purpose referred to in art. 2.1. letter a): in general, 10 years pursuant to art. 2220 paragraph 1) Italian Civil Code, to be read in conjunction (and by analogy, if necessary) with art. 5 paragraph 5) and 8 paragraph 1) of ISVAP Regulation n. 27 of 14.10.2008 (to be read, in turn, in conjunction with art. 101 and 165 of Legislative Decree n. 206/2005); with exclusive regard to the recording of the activity of tele/video veterinary consultancy: in general, up to n. 3 months after the final termination of the contractual relationship between IMA ITALIA and the relevant supplier used, for this purpose, by IMA ITALIA; with exclusive regard to the registration to a specific mobile software application: until the registered interested party manifests, by

conclusive behaviour, the intention to de-register or until the latter is allowed to use such mobile software application; **(ii)** for the performance of the processing purpose referred to in art. 2.2. letter b): in general, n. 10 years from the final termination of any judicial/judicial dispute (see by analogy: the document "National archiving system - guidelines for the selection and discarding of documents", signed by the Inland Revenue Italian); **(iii)** to perform the processing purpose referred to in art. 2.3. letter c): in general, n. 5 years from the final settlement of the claim, in accordance with the provisions of the relevant organisational procedure prepared by IMA ITALIA in accordance with ISVAP Regulation n. 24 of 19 May 2008; **(iv)** for the performance of the processing purpose referred to in art. 2.3. letter d): in general, n. 2 years; **(v)** for the performance of the processing purpose referred to in art. 2.3. letter e): in general, n. 1 year; **(vi)** for the performance of the processing purpose referred to in art. 2.4. letter f): until revocation of consent.

4. Target audience.

4.1. In compliance with art. 13 paragraph 1) letter e) of the GDPR (or in compliance with art. 14 paragraph 2) letter b) of the GDPR, if applicable), IMA ITALIA specifies that personal data and/or any particular personal data and/or any judicial personal data may be subject to communication, if necessary and appropriate, to one or more recipients under art. 4 n. 9) of the GDPR, identified, in general, by category as follows: **(i)** for the performance of the processing purpose referred to in art. 2.1. letter a): subjects authorised to process pursuant to art. 4 n. 10), 29 and 32 paragraph 4) of the GDPR by IMA ITALIA (hereinafter "subjects authorised to process by IMA ITALIA"); subsidiaries/parent companies/facilitators that are part of the business group of IMA ITALIA (e.g. IMA SERVIZI S.c.a.r.l.), in compliance with Recital n. 48) of the GDPR, and art. 30 septies of Legislative Decree n. 206/2005 (to be read, together with IVASS Regulation n. 38 of 3.7.2018); subjects/suppliers that are part, in various ways, of the so-called insurance chain, better described in the Italian Privacy Guarantor's Order of 26.4.2007 [web doc. no. 1410057] or whose professional (and non-professional) services are necessary/functional for the complete preparation/management of the insurance file/practice (e.g. intermediary/distributor/agent/broker; adjuster; reinsurer; co-insurer; liquidator; doctor (insurance fiduciary); craftsman/specialist; health/social (social) worker/team); companies/professionals providing services connected, directly or indirectly, to the performance of the processing purpose in question (e.g. ICT company; legal/tax consultant); IVASS; ANIA; subjects legitimately operating within the SIC (Credit Information System); business partners; third parties (public or private or publicly controlled) involved, directly or indirectly, in the performance and proper management of the insurance service (e.g. health facility; air carrier); police/judicial/financial authorities; health facility, including public emergency services; **(ii)** for the performance of the processing purpose referred to in art. 2.2. letter b): subjects authorised to process by IMA ITALIA; subsidiaries/parent companies/facilitators that are part of the business group of IMA ITALIA; companies/firms/professionals that provide services connected, directly or indirectly, to the performance of the processing purpose in question (e.g. legal advisor); IVASS; commercial partner; **(iii)** for performance of the processing purpose referred to in art. 2.3. letter c): parties authorised to process the data by IMA ITALIA; subsidiaries/controlling companies/faculty members of the business group of IMA ITALIA; IVASS; companies/companies/professionals who provide services directly or indirectly connected to performance of the processing purpose in question (e.g. legal advisor); commercial partner; **(iv)** for performance of the processing purpose referred to in art. 2.3. letter d): subjects authorised to process by IMA ITALIA; companies controlled/controlling/part of the IMA ITALIA business group; IVASS; **(v)** for the execution of the processing purpose referred to in art. 2.3. letter e): subjects authorised to process by IMA ITALIA; companies controlled/controlling/part of the IMA ITALIA business group; companies/businesses/professionals who provide services connected, directly or indirectly, to the execution of the specific processing purpose (e.g. call centre/customer care/ICT companies); commercial partners; **(vi)** for the execution of the processing purpose referred to in art. 2.4. letter f): subjects authorised to process by IMA ITALIA; companies controlled/controlling/part of the IMA ITALIA business group; companies/businesses/professionals who provide services connected, directly or indirectly, to the execution of the specific processing purpose (e.g. distributor/intermediary; (web) marketing company/agency).

5. Transfer.

5.1. Personal data and/or any particular personal data and/or any judicial personal data are/may be stored in automated/partially automated/non-automated files belonging to, or in any case traceable, even indirectly, to IMA ITALIA, and located within the European Economic Area (EEA).

6. Rights of the data subject.

6.1. In relation to personal data and/or any particular personal data and/or any judicial personal data, IMA ITALIA informs you of your right to exercise the following rights, which may be subject to the further limitations provided for in Articles 2 undecies and 2 duodecies of the Privacy Code: right of access pursuant to art. 15 of the GDPR: right to obtain confirmation of whether or not personal data is being processed, as well as the information referred to in Article 15 of the GDPR (e.g. purpose of processing, storage period); right of rectification under art. 16 of the GDPR: right to correct, update or supplement personal data; right to erasure under art. 17 of the GDPR: right to obtain the deletion or destruction or anonymisation of personal data, where the conditions listed in the same article apply; right to restriction of processing under art. 18 of the GDPR: the right to obtain the limitation of processing where the conditions set out in art. 18 apply; right to data portability under art. 20 of the GDPR: the right to obtain the personal data provided to IMA ITALIA in a structured, commonly used and machine-readable format (and, where required, to transmit it directly to another data controller), where the specific conditions set out in the article exist (e.g. legal basis for consent and/or execution of a contractual agreement and/or execution of a contractual agreement). legal basis of consent and/or performance of a contract; personal data provided by the data subject); right of objection under art. 21 of the GDPR: right to obtain the cessation, on a permanent basis, of a given processing of personal data; right to lodge a complaint with the Supervisory Authority (i.e. the Italian Data Protection Authority) under art. 77 of the GDPR: right to lodge a complaint where it is considered that the processing under analysis violates national and EU data protection legislation.

6.2. In addition to the rights described in art. 6.1. above, IMA ITALIA points out that there is, where possible and conferring, the right to exercise, on the one hand, the (sub)right provided for in art. 19 of the GDPR ("The data controller shall communicate to each of the recipients to whom the personal data have been transmitted any rectification or erasure or restriction of processing carried out pursuant to art. 16, 17(1) and 18, unless this proves impossible or involves a disproportionate effort. The data controller shall inform the data subject of such recipients if the data subject so requests"), to be considered connected and related to the exercise of one or more of the rights governed by art. 16, 17 and 18 of the GDPR; on the other hand, IMA ITALIA specifies that there is, where possible and conferrable, the option of exercising the right provided for by art. 22 paragraph 1) of the GDPR ("The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him/her or significantly affects him/her in a similar way"), subject to the exceptions provided for in paragraph 2) below.

6.3. In accordance with art. 12 paragraph 1) of the GDPR, IMA ITALIA undertakes to provide the communications referred to in art. 15 to 22 and 34 of the GDPR in a concise, transparent, intelligible, easily accessible form and in plain and clear language: this information will be provided in writing or by other electronic means where appropriate or, at the request of the person concerned, will be provided orally provided that the identity of the latter is proven by other means.

6.4. In compliance with art. 12 paragraph 3) of the GDPR, IMA ITALIA informs that it undertakes to provide information about the action taken regarding a request pursuant to art. 15 to 22 of the GDPR without undue delay and, in any case, no later than one month after receipt of the request; this term may be extended by 2 months if necessary, taking into account the complexity and number of requests (in this case, IMA ITALIA undertakes to inform of such extension and the reasons for the delay, no later than one month after receipt of the request).

6.5. The rights described above (with the exception of the right pursuant to art. 77 of the GDPR) may be exercised by means of the contact details set out in art. 7 below.

7. Contact details.

7.1. IMA ITALIA can be contacted at the following address: ufficioprotezionedati@imaitalia.it.

7.2. The Data Protection Officer (DPO) under art. 37 of the GDPR, appointed by the business group to which IMA ITALIA belongs, can be contacted at the following address: dpoimaitalia@imaitalia.it.

Sesto S. Giovanni (MI), 26.3.2025 (date of last update).

IMA ITALIA ASSISTANCE S.p.A.

(in the person of its legal representative pro tempore)

COOKIE POLICY

IMA ITALIA ASSISTANCE S.p.A., (Tax Code: 09749030152 - VAT No.: 02069150965) (hereinafter "IMA ITALIA"), in the person of its pro tempore legal representative, with registered office in Sesto S. Giovanni (MI), Piazza Indro Montanelli, 20, in its capacity as Data Controller pursuant to Articles 4(7) and 24 of EU Regulation No. 2016/679 (GDPR), sets out below its cookie policy ("Policy") applicable solely to this website www.sinistri.imaitalia.it (Website).

1. Legal framework of reference.

1.1. The Policy is based on the following EU and/or national regulatory provisions (first and/or second level): (i) Directive No. 2002/58/EC of 12 July 2002 (the so-called ePrivacy Directive), as amended by Directive No. 2009/136/EC; (ii) Article 122 of the amended Legislative Decree No. 196/2003 (Privacy Code), which transposed the ePrivacy Directive into national law; (iii) GDPR: Articles 4(11), 7, 12, 13, 25 and 95 (in addition, in particular, to Recitals 30, 32 and 173); (iv) Guidelines No. 5/2020 adopted on 4 May 2020 by the EDPB, replacing the Guidelines of 10 April 2018 signed by WP Art. 29; (v) Provision No. 231 of 10 June 2021 [web doc. No. 9677876] signed by the Data Protection Authority (Privacy Guarantor); (vi) Recommendation No. 2/2001 of the WP Art. 29; (vii) Opinion No. 2/2010 of the WP Art. 29; (viii) Opinion No. 4/2012 of the WP Art. 29; (ix) Guidelines No. 8/2020 of the EDPB; (x) Measures No. 224 of 9 June 2022 [web doc. No. 9782890], No. 243 of 7 July 2022 [web doc. No. 9806053] and No. 254 of 21 July 2022 [web doc. No. 9808698] signed by the Data Protection Authority.

2. Cookies and other tracking tools: definition and classification.

2.1. Cookies¹ are, as a rule, strings of text that a website ('publisher' or 'first party') visited by the user or a different website ('third party') places and stores, directly (in the case of the first-party website) or indirectly (through the latter, in the case of the third-party website), on a terminal device available to the user. In this regard, the Data Protection Authority has specified that the information encoded in cookies may include both personal data pursuant to Article 4(1) of the GDPR (e.g. IP address, username; email address; unique identifier) and non-personal data pursuant to Article 3(1) of EU Regulation No. 1807/2018 (e.g. language; type of device used). Alongside (or in addition to) these, there may be (and therefore be used) **'other tracking tools'**, which can be divided into 'active' (which have almost the same characteristics as cookies) and 'passive' (e.g. fingerprinting).

2.2. Beyond the intrinsic characteristics described above, cookies (and other tracking tools) may have different characteristics in terms of time (and therefore be considered 'session'² or 'permanent'³, depending on their duration), from a subjective point of view (depending on whether the publisher acts independently or on behalf of a "third party") and, finally (but in particular), based on the purpose of the processing pursued, so that they can be divided into two different (macro) categories:

- ✓ "technical", used for the sole purpose of "carrying out the transmission of a communication over an electronic communications network, or as strictly necessary for the provider of an information society service explicitly requested by the contractor or user to provide that service" (Article 122(1) of the Privacy Code).

In this regard, the Privacy Guarantor has highlighted, in Provision no. 231 of 10 June 2021 (in line with the previous Provision on the subject of 2014), that "analytics **cookies**"⁴ may well be included within the scope of cookies (or other tracking tools) of a "technical" nature (and, therefore, may be used without the prior consent of the data subject), under certain conditions, aimed at precluding the possibility that their use could lead to the direct identification of the data subject (single out)⁵.

¹ See Recital 30) of the GDPR ("Natural persons may be associated with online identifiers generated by the devices, applications, tools and protocols they use, such as IP addresses, temporary markers (cookies) or other identifiers, such as radio frequency identification tags. Such identifiers may leave traces which, in particular when combined with unique identifiers and other information received from servers, may be used to create profiles of natural persons and identify them"), and Article 122(1) and (2) of the Privacy Code ("1. The storage of information in the terminal equipment of a contractor or user or access to information already stored is permitted only on condition that the contractor or user has given their consent after being informed in a simplified manner. This does not prohibit the technical storage or access to information already stored if it is 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 contractor or user to provide that service. For the purposes of determining the simplified methods referred to in the first sentence, the Guarantor shall also take into account the proposals made by the most representative national associations of consumers and economic categories involved, also with a view to ensuring the use of methods that guarantee the effective awareness of the contractor or user. 2. For the purposes of expressing the consent referred to in paragraph 1, specific configurations of computer programs or devices that are easy and clear to use for the contractor or user may be used..."); see also page 15) of Provision No. 231 of 10 June 2021 signed by the Privacy Guarantor: "...to date, there is still no universally accepted system of semantic coding of cookies and other tracking tools that allows for an objective distinction to be made, for example, between technical cookies and analytics or profiling cookies, other than on the basis of the information provided by the data controller in the privacy policy [...] the hope is that a general coding system will be agreed upon quickly".

² Cookies designed to collect and store data while a user accesses a website, and disappear once the user has closed the relevant browsing session.

³ Cookies designed to last for a predetermined period of time (e.g. minutes, months, years).

⁴ Analytical cookies are usually used to evaluate the effectiveness of an information society service provided by a publisher, to design a website or, finally, to help measure its traffic (i.e. the number of visitors, possibly broken down by geographical area and time of connection).

⁵ See Provision no. 231 of 10.6.2021 signed by the Privacy Guarantor, pp. 13/14: "The structure of the analytics cookie must therefore allow for the possibility that it may refer not only to one but to several devices, so as to create reasonable uncertainty about the digital identity of the person receiving it. As a rule, this effect is achieved by masking appropriate portions of the IP address within the cookie. Taking into account the representation of 32-bit IP version 4 (IPv4) addresses, which are usually represented and used as a sequence of four decimal numbers between 0 and 255 separated by a dot, one of the measures that can be implemented in order to benefit from the exemption is to mask at least the fourth component of the address, an option that introduces an uncertainty in the attribution of the cookie to a specific data subject equal to 1/256 (approximately 0.4%). Similar procedures should be adopted with regard to IP version 6 (IPv6) addresses, which have a different structure and a vastly superior addressing space (consisting of binary numbers represented by 128 bits). The Data Protection Authority also emphasises the need for the use of analytics cookies to be limited solely to the production of aggregate statistics and for them to be used in relation to a single website or a single mobile application, so

- ✓ **"profiling"/"marketing" cookies** (so-called non-technical cookies), used to trace specific actions or recurring behavioural patterns in the use of the features offered (patterns) back to specific, identified or identifiable individuals, in order to group the various profiles into homogeneous clusters of varying sizes, so that the Data Controller can, among other things, to tailor the provision of the service in an increasingly personalised manner beyond what is strictly necessary for the provision of the service, as well as to send targeted advertising messages (i.e., in line with the preferences expressed by the user when browsing the web).

3. Cookies installed on the Website.

3.1. The following types of cookies have been installed (or may be installed, subject to obtaining the user's specific consent) on the Website:

Name	Type	Function	First/Third party	Duration ⁶
PHPSESSID	Technical	Used to identify user sessions, in order to maintain status information from one page to another, and to manage, for example, authentication; its ID is a random value, which is associated with the user for the duration of the session.	First part	Session

4. Browser settings.

4.1. IMA ITALIA highlights the possibility for the user to delete and block the operation of the cookies described in Article 3 above at any time by using the appropriate settings within the browser used: In this regard, IMA ITALIA adds that, if the user decides to disable the technical cookies referred to in Article 2.2. point i), the quality and speed of the services and features offered and made available on the Website may deteriorate.

Information on how to manage cookies with some of the most popular browsers can be found by visiting the following web pages:

<https://support.google.com/chrome/answer/95647?hl=it>

<https://support.mozilla.org/it/kb/Gestione%20dei%20cookie?redirectlocale=enUS&redirectslug=Cookies>

<https://support.microsoft.com/it-it/help/17442>

<https://support.microsoft.com/it-it/help/4468242/microsoft-edge-browsing-data-and-privacy-microsoft-privacy>

<https://support.apple.com/it-it/guide/safari/sfri11471/mac>

<https://support.apple.com/it-it/HT201265>

<https://help.opera.com/en/latest/security-and-privacy/#clearBrowsingData>

5. Rights of the data subject.

5.1. With regard to the user's personal data, IMA ITALIA informs that the data subject pursuant to Article 4(1) of the GDPR has the right to exercise the following rights, which may be subject to the limitations provided for in Articles 2-undecies and 2-duodecies of the Privacy Code: right of access pursuant to Article 15 of the GDPR: the right to obtain confirmation as to whether or not personal data concerning the data subject are being processed, as well as the information referred to in Article 15 of the GDPR (e.g. purposes of processing, storage period); right to rectification pursuant to Article 16 of the GDPR: the right to correct, update or supplement personal data; right to erasure pursuant to Article 17 of the GDPR: right to obtain the erasure or destruction or anonymisation of personal data, where the conditions listed in the same article are met; right to restriction of processing pursuant to Article 18 of the GDPR: right with a markedly precautionary connotation, aimed at obtaining the restriction of processing where the conditions governed by Article 18 itself are met; right to data portability pursuant to Article 20 of the GDPR: the right to obtain personal data provided to IMA ITALIA in a structured, commonly used and machine-readable format (and, where requested, to transmit it directly to another data controller), where the specific conditions indicated in the same article are met (e.g. legal basis of consent and/or performance of a contract; personal data provided by the data subject); right to object pursuant to Article 21 of the GDPR: right to obtain the permanent cessation of a specific processing of personal data; right to lodge a complaint with the Supervisory Authority (i.e., the Italian Data Protection Authority) pursuant to Article 77 of the GDPR: right to lodge a complaint where it is believed that the processing under analysis violates national and EU legislation on the protection of personal data.

5.2. In addition to the rights described in Article 5.1 above, IMA ITALIA specifies that, in relation to the personal data of the data subject, there is, where possible and appropriate, the right to exercise, on the one hand, the (sub) right provided for in Article 19 of the GDPR ("The controller shall communicate any rectification or erasure or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18 to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall communicate those recipients to the data subject upon request"), which is

as not to allow the tracking of the browsing of persons who use different applications or browse different websites. It is therefore understood that third parties providing web measurement services to publishers must not combine the data, even if minimised, with other processing (e.g. customer files or statistics on visits to other sites) or transmit it to other third parties, as this would lead to an unacceptable increase in the risk of user identification. except in cases where the statistics they produce with the minimised data concern multiple domains, websites or apps attributable to the same publisher or business group. However, even in the absence of the prescribed minimisation measures, it is possible to consider lawful the use of statistical analyses relating to multiple domains, websites or apps attributable to the same data controller is considered lawful, provided that the data controller carries out the statistical processing itself and that such analyses do not result in an activity that, going beyond the boundaries of a mere statistical count, actually takes on the characteristics of processing aimed at making commercial decisions.

⁶ It should be noted that each time the website is accessed, the so-called temporal refresh of the cookie duration may occur.

to be considered connected and related to the exercise of one or more rights regulated by Articles 16, 17 and 18 of the GDPR; on the other hand, IMA ITALIA specifies that, in relation to the personal data of the data subject, where possible and appropriate, the right provided for in Article 22(1) of the GDPR ("The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her"), subject to the exceptions provided for in paragraph 2 below.

5.3. In accordance with Article 12(1) of the GDPR, IMA ITALIA undertakes to provide the user with the communications referred to in Articles 15 to 22 and 34 of the GDPR in a concise, transparent, intelligible and easily accessible form, using clear and plain language: such information shall be provided in writing or by other electronic means or, at the user's request, shall be provided orally, provided that the user's identity is verified by other means.

5.4. In accordance with Article 12(3) of the GDPR, IMA ITALIA informs that it undertakes to provide the user with information regarding the action taken in response to a request pursuant to Articles 15 to 22 of the GDPR without undue delay and, in any case, no later than one month after receipt of the request; this period may be extended by two months if necessary, taking into account the complexity and number of requests (in this case, the Data Controller undertakes to inform the user of this extension and the reasons for the delay within one month of receiving the request).

5.5. The user may exercise the above rights at any time (with the exception of the right under Article 77 of the GDPR) by using the contact details provided in Article 6.

6. Contact details.

6.1. IMA ITALIA can be contacted at the following address: ufficioprotezionedati@imaitalia.it

6.2. The Data Protection Officer (DPO) pursuant to Article 37 of the GDPR, appointed by IMA ITALIA, can be contacted at the following address: dpoimaitalia@imaitalia.it

Sesto S. Giovanni (MI), 1.9.2025 (date of last update).

IMA ITALIA ASSISTANCE S.p.A.

(in the person of its pro tempore legal representative)