PRIVACY POLICY

Flexi S.r.l., in its capacity as Controller, intends to provide the following specific information on the management of the websites (https://www.flexigroup.it/ and other websites connected thereto) with regard to the processing of the personal data of the users who consult them.
This notice is also provided pursuant to Article 13 of Regulation (EU) 2016/679 ("GDPR") (hereinafter, the "Privacy Legislation"), taking into account the "Guidelines 05/2020 on consent under Regulation 2016/679".

CONTROLLER

Flexi S.r.l. is the Controller of the personal data connected with the use of the website, with registered office at Via Inveruno No. 95 – 20038 Busto Garolfo (MI), Italy, in the person of its pro-tempore Legal Representative,
e-mail: privacy@flexigroup.it.

TYPES OF DATA PROCESSED

The types of data and information collected and processed by Flexi S.r.l. are:

- browsing data (automatically collected);
- data voluntarily provided by the user;
- data collected through the use of cookies.

BROWSING DATA

The IT systems and software procedures used to operate the website acquire, in the course of their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols.
Such information is not collected in order to be associated with identified data subjects; however, by its very nature, it 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, as well as other parameters relating to the user's operating system and IT environment.
Such data are used exclusively for the purpose of obtaining anonymous statistical information on the use of the Website and verifying its correct functioning, and are retained for the period strictly necessary for the statistical analysis.
The data may also be used to establish liability in the event of hypothetical computer crimes against the Website.

DATA VOLUNTARILY PROVIDED BY THE USER

Flexi S.r.l. collects the personal data voluntarily provided by users through the websites https://www.flexigroup.it/ and other websites connected thereto, in the following cases:

1. the sending by users, to the postal address, fax number or e-mail address indicated on the "Contacts" page, of messages containing requests for information;
2. the voluntary submission by users of their personal data in order to receive information on Flexi S.r.l. products;
3. the voluntary submission of information by users, by completing the relevant form, in order to receive newsletters.

USE OF COOKIES

The Website uses cookies in accordance with the adopted Cookie Policy.

INFORMATION ON THE PROCESSING OF PERSONAL DATA CARRIED OUT THROUGH SOCIAL MEDIA PLATFORMS

With regard to the processing of personal data carried out by the providers of the social media platforms used by the Controller, reference is made to the information provided by such providers in their respective privacy policies.
The Controller processes the personal data provided by users through the dedicated social media platform pages in order to manage interactions with users (comments, public posts, etc.), in compliance with the applicable legislation.

PURPOSES OF THE PROCESSING

Personal data will be processed for the following purposes:

1. **Browsing of this website.** The data necessary for the use of the web services are also processed for the purpose of: obtaining statistical information on the use of the services (most visited pages, number of visitors by time slot or by day, geographical areas of origin, etc.); monitoring the proper functioning of the services offered; defensive purposes, in the event of misuse of the website or attempted fraud;
2. **Use of cookies and similar technologies**. Please refer to the cookie policy available in the website footer.

In addition to browsing and the use of cookies, personal data will be processed for the following purposes:

A) **CONTACTS** – sending of contact requests and requests for information, and management of the responses to the user's requests.
B) **DIRECT MARKETING**, for sending advertising or direct sales material or for carrying out market research, commercial and promotional communications and newsletters, by e-mail. Communications sent by e-mail contain tracking pixels, i.e. images of minimal size which, when the message is opened, allow the Controller to detect that the message has been opened, the date, time and number of openings, clicks on links, the IP address, and the device and operating system used. Such data, relating to the individual recipient, are

used to compare and improve the results of communications and to adapt their content and frequency.

C) **MANAGEMENT OF YOUR REQUESTS and of the requests submitted by other data subjects pursuant to Articles 15 et seq. of the GDPR (rights of the data subject).**

LEGAL BASIS FOR THE PROCESSING

The processing of your personal data is based on:

- for purpose (1): the legitimate interest of the Controller (Article 6(1)(f) GDPR) in ensuring the proper functioning and security of the website, in producing anonymous statistics on the use of the services and in defending itself against abuse or fraudulent use of the website, provided that such interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, taking into account the reasonable expectations of the data subject and the strictly necessary nature of the data processed. Any storage of information in the user's terminal equipment, or access to information already stored therein, which is strictly necessary for the functioning of the website and for the provision of the service requested by the user, does not require consent pursuant to Article 122(1) of Legislative Decree No. 196/2003, as indicated in the Cookie Policy;

- for purpose (2): the consent of the data subject (Article 6(1)(a) GDPR).

The processing of your personal data is also based on:

- for purpose (A): the performance of a contract to which the data subject is party or the taking of steps at the request of the data subject prior to entering into a contract (Article 6(1)(b) GDPR);

- for purpose (B): the consent of the data subject (Recitals 42 and 43; Article 6(1)(a) GDPR). For the use of tracking pixels, consent pursuant to Article 122 of Legislative Decree No. 196/2003, included in the consent to this purpose.

- for purpose (C): the need to comply with a legal obligation to which the Controller is subject (Article 6(1)(c) GDPR).

Tracking pixels in e-mails without consent. Irrespective of the consent referred to in purpose (B), the Controller may use tracking pixels pursuant to Article 122(1) of Legislative Decree No. 196/2003: (i) for overall statistics on the open rate of campaigns, on the correct delivery of messages and for combating spam, using anonymised data which do not allow measurements relating to the individual recipient; (ii) in security communications and in service communications which the Controller is required to send. The data subject may also prevent tracking by disabling the automatic download of images in his or her e-mail client.

NATURE OF THE PROVISION OF DATA

Without prejudice to the provisions regarding browsing data, users are free to provide their personal data. Failure to provide such data may make it impossible for Flexi S.r.l. to receive the requests for information sent by users through the Contacts page or to perform the services requested (e.g. sending information on the Company and/or its products).
Users are free to provide their data and to give their consent to receive promotional communications. The provision of data is optional. Failure to give consent will make it impossible

to receive direct marketing communications. Consent to tracking alone may be withdrawn separately, while continuing to receive communications.
The provision of personal data in the context of requests made by data subjects pursuant to Articles 15 et seq. of the GDPR is mandatory, as it is essential in order to comply with the legal obligations to which the Controller is subject.

DATA RETENTION PERIOD
The Controller will retain personal data for the time strictly necessary to achieve the purposes for which they were collected. In particular:

- for purpose (1): browsing data will be retained for the duration of the browsing session and for the time necessary to establish any computer crimes and for defensive purposes;
- for purpose (2): for the period indicated in the Cookie Policy.

- for purpose (A): a maximum of 12 months;
- for purpose (B): contact data: until consent is withdrawn (or opt-out). Individual open and click data: 12 months from collection and in any case no longer than the withdrawal of consent to tracking or unsubscription; thereafter deleted or anonymised;
- for purpose (C): 5 years from the closure of the request, except in the event of litigation.

METHODS OF PROCESSING
Personal data are processed by automated tools and in paper form, for the time strictly necessary to achieve the purposes for which they were collected, as indicated above. Specific security measures are adopted to prevent the loss of personal data, unlawful or incorrect use thereof and unauthorised access. In particular, the Website uses the secure HTTPS protocol for certain restricted areas of the website and of the applications, as well as measures to protect against unauthorised access to servers and other information systems in use.

RECIPIENTS OF THE DATA
Personal data will be disclosed to entities that will process them as independent controllers or as processors (Article 28 GDPR), and will be processed by natural persons (Article 29 GDPR) acting under the authority of the Controller and of the processors on the basis of specific instructions given as to the purposes and methods of processing. The data will be disclosed to recipients belonging to the following categories:

- Entities providing services for the website and communication networks, including e-mail, hosting and website management;
- Entities with which the Controller has entered into agreements, subject to consent where required;
- For direct marketing, subject to consent, entities managing direct marketing activities;
- Competent authorities, for compliance with legal obligations and/or provisions of public bodies, upon request.

The list of processors pursuant to Article 28 GDPR is available by writing to privacy@flexigroup.it or to the other contact details indicated above.

TRANSFER OF DATA OUTSIDE THE EEA
Personal data will not be transferred to countries outside the EEA**.**

AUTOMATED DECISION-MAKING
Personal data will be subject to traditional manual, electronic and automated processing.
It is hereby specified that no fully automated decision-making processes are carried out.

RIGHTS OF DATA SUBJECTS
Data subjects may exercise the rights provided for in Articles 15 et seq. of the GDPR by contacting the Controller at the following e-mail address: privacy@flexigroup.it. The Controller guarantees data subjects the right to request, at any time, access to their personal data (Article 15), rectification (Article 16), erasure (Article 17) and restriction of processing (Article 18). The Controller shall communicate (Article 19) any rectification, erasure or restriction of processing carried out to each recipient to whom the personal data have been disclosed. Upon request, the Controller shall also inform data subjects about those recipients. The Controller also guarantees the right to data portability (Article 20) and, in the event of requests pursuant to that Article, will provide data subjects with the data in a structured, commonly used and machine-readable format.
Data subjects have the right to object (Article 21), at any time, to the processing of personal data based on legitimate interest, by writing to the contact details indicated above with the subject line “objection”.
Data subjects also have the right to withdraw their consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
In order to stop receiving direct marketing communications by e-mail, data subjects are invited to send an e-mail to privacy@flexigroup.it with the subject line “unsubscribe from automated”, or to use the automatic unsubscribe systems provided for e-mail communications (opt-out).

In order to withdraw consent to tracking via pixels only, while continuing to receive communications, data subjects may use the “Manage tracking preferences” link contained in every e-mail, which leads to the Preference Centre, or send an e-mail to privacy@flexigroup.it with the subject line “withdrawal of tracking”. Following withdrawal, opens and clicks are recorded in anonymous form only. Data subjects’ choices are recorded.

Where data subjects consider that the processing of personal data carried out by the Controller infringes Regulation (EU) 2016/679, they have the right to lodge a complaint with the competent national supervisory authority, in particular in the Member State of their habitual residence or place of work or of the place of the alleged infringement (Italian Data Protection Authority – Garante per la protezione dei dati personali – https://www.garanteprivacy.it/), or to bring proceedings before the competent courts.

FURTHER INFORMATION ON THE PROCESSING OF DATA
Further information on the processing of Personal Data may be requested from the Controller at any time, using the contact details indicated.
Specific privacy notices may be made available in the sections dedicated to data collection.

AMENDMENTS TO THIS PRIVACY POLICY

The Controller periodically reviews its privacy and security policy and, where necessary, amends it in the light of regulatory or organisational changes or technological developments. In the event of amendments, the updated version of the Privacy Policy will be published on this page of the website. Where such amendments concern processing operations based on consent, the Controller will collect the User's consent again, where required.

Last updated: 30 October 2026