

## Privacy Policy of HWG Sababa S.r.l. with sole shareholder

*Information on the processing of personal data pursuant to Regulation (EU) 2016/679 ("GDPR") and Legislative Decree of June 30, 2003, No. 196 and subsequent amendments ("Privacy Code").*

This Privacy Policy describes, in the following sections, how HWG Sababa S.r.l. collects and processes the personal data of its customers, potential customers, and users of its website (<https://www.hwgsababa.com>), as well as in relation to any Whistleblowing reports.

### 1. Data Controller and Data Protection Officer

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The Data Controller is HWG Sababa S.r.l. with sole shareholder (hereinafter also "Data Controller", "Company" or "HWG Sababa"), with registered office in Piazza Tre Torri 2, 20145 Milano (MI), tel. 045 493 2800, [compliance@hwgsababa.com](mailto:compliance@hwgsababa.com).

Data Protection Officer is Mr. Christian Bernieri (e-mail [dpo@6ft.it](mailto:dpo@6ft.it)).

### 2. Purposes for which your personal data may be used and related legal bases. Categories of processed data

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(a) **Website Navigation:** to enable navigation on our website; to carry out aggregate statistical analyses aimed at assessing the proper functioning of the website; and, in the event of cybercrimes, to cooperate with the competent authorities for the identification of any liability.

Our website uses only **technical and first-party analytical cookies**, i.e., those generated directly by the domain you are visiting, for the following purposes:

- i. **Technical cookies:** strictly necessary to ensure website navigation, authentication, and basic platform functionality. The processing duration is strictly tied to the technical purpose, and therefore, these cookies have a short lifespan—either session-based or lasting no more than 6 months.
- ii. **First-party analytical cookies:** these collect data in an aggregated and anonymized form for statistical monitoring of traffic and the ongoing improvement of the user experience. The processing duration is very brief; data is anonymized immediately and subsequently processed in aggregate form.

No profiling cookies or third-party advertising cookies are installed.

The legal basis for both types of processing (i and ii) is the **legitimate interest** (Regulation (EU) 2016/679, Art. 6, para. 1, letter f) of the data controller in responding to incoming requests, promoting its services through the website, improving the usability of the website through aggregate usage analysis, and protecting the company against unlawful conduct.

Data processed: IP addresses; browser data (user agent); usage data such as pages visited and links clicked; approximate geographic location inferred from the IP address; device information; session statistics.

In the event of form submissions, the following data voluntarily provided by users may also be processed: email address, first name, last name, phone number, profession, and any information included in the request.

Such data is acquired by the IT systems used to operate this website.

(b) **Sending of communications and commercial information ("Direct Marketing" and "Newsletter"):** sending of commercial communications and information, periodic newsletters on news, events related to our company or, more generally, topics concerning cyber security, as well as communications about initiatives and events, offers, and promotions via email and text messages, regarding products and services marketed by the Data Controller.

Data processed: contact data (first name, last name, email address, phone number, job title, company).

Legal basis: the informational newsletter is sent based on legitimate interest pursuant to Art. 130 of the Italian Privacy Code. The sending of commercial communications, on the other hand, is based on your consent, which can be withdrawn at any time.

Each user has the right to object from the moment the personal data is provided and, subsequently, at any time, either by writing to [EMAIL ADDRESS] or by clicking on the appropriate section within the marketing email received.

Objection to processing does not affect the lawfulness of processing carried out prior to the objection. Processing will be interrupted upon simple request by the user or after one year in the absence of any interaction with the messages sent.

**(c) Defense of Rights in Legal, Administrative, or Extrajudicial Proceedings, and in Disputes Related to Offered Products and Services:** to defend the rights of HWG Sababa and/or take legal action or make claims against you and/or third parties in the course of legal, administrative, or extrajudicial proceedings or disputes related to offered products and services.

Data processed: Contact data (name, surname, email address, phone number); any other types of personal data provided by you for the execution of a contract.

Legal basis: Legitimate interest.

**(d) Compliance with legal obligations, regulations, or provisions/requests from authorities legally entitled to make them and/or supervisory and control bodies:** to comply with the obligations to which HWG Sababa is subject under laws, regulations, or as a result of provisions/requests from authorities legally entitled to make them and/or supervisory and control bodies.

Data processed: contact data (IP address, browsing or interaction data on the website, first name, last name, email address, phone number if provided); any other categories of personal data you may provide through the website.

Legal basis: compliance with legal obligations.

**(e) Video surveillance:** purposes and methods of recording related to access to our company premises in Verona, Genoa, and Pero. HWG Sababa processes your image data collected through video recordings (following access to the company offices in Verona, Genoa, or Pero) using IT and electronic tools, through video surveillance systems (for both recording and remote viewing purposes), in order to protect the company's assets, in accordance with Regulation (EU) 2016/679 (GDPR) and the "EDPB Guidelines 3/2019 on processing of personal data through video devices, version 2.0, adopted on 29 January 2020."

The presence of video cameras is indicated by appropriate signage; this privacy notice supplements the summary notice provided on signs placed near the cameras. A full version of the privacy notice related to this processing is available to individuals visiting the aforementioned premises.

Data processed: image data.

Legal basis: HWG Sababa's legitimate interest in protecting corporate assets.

Data retention period: a few days, as necessary for the above-mentioned purpose.

**(f) Statistical Analysis and Profiling:** processing data for statistical purposes and analyzing and predicting your purchasing choices through algorithms and other automated systems. This is done to offer products and services that are increasingly satisfactory to our customers and to develop personalized promotions and/or commercial communications (profiling purpose).

Processed Data: Contact data (name, surname, email address, phone number), purchased products/services, and any other types of personal data provided by you for the execution of a contract.

Legal Basis: your consent.

**(g) Participation in Webinars:** processing of your personal data (e.g., images) potentially recorded by audio-video recording systems during the consumption of the event (webinar) in deferred mode. The provision of data is necessary for the purpose of registration and participation in the webinar and the subsequent sending of service communications. Refusal to provide them prevents the registration from being completed.

Data processed: first name, last name, email address, role and relevant industry sector, image data.

Legal basis: contract.

**(h) Quality Control, Research, and Development:** in order to improve the products and services of our company, HWG Sababa may use any information received within the contracted and delivered services for quality control and product and service development purposes. Before initiating this processing, your information will be anonymized so that it cannot be traced back to you.

Processed Data: Contact data (name, surname, email address, phone number, job title, company); any other types of personal data provided by you for the execution of a contract.

Legal Basis: Legitimate interest of HWG Sababa in meeting the expectations of its customers and continuing to improve its products and services.

**(i) Reports via the My Whistleblowing Zucchetti Platform or Other Methods:** personal data provided by you are used solely for the purpose of managing the Whistleblowing report made by you (according to the methods and channels specified in the Whistleblowing Regulation, available on the company's website in the dedicated section). The report may concern one of the Italian offices of HWG Sababa listed here: <https://www.hwgsababa.com/contacts>

Authorized employees responsible for handling whistleblowing reports and the members of the Supervisory Body pursuant to Legislative Decree 231/2001 may have access to your personal data.

Additionally, considering that whistleblowing reports may be submitted through the My Whistleblowing software, the provider of said application—appointed as data processor pursuant to Article 28 of the GDPR—may also have access to your personal data.

It is understood that, in accordance with the confidentiality protection principle outlined in Law 179/2017, the sharing of your personal data will be strictly limited to what is necessary in order to ensure the confidentiality of the reporting person.

A dedicated and supplementary privacy notice is available on the whistleblowing reporting platform.

Data processed: first name; last name; email address; (if provided) phone number; content of the report.

Legal Basis: Legal obligation arising from the provisions of Article 6 of Legislative Decree no. 231 of 2001, as amended by Law no. 179 of 2017, concerning "Provisions for the protection of authors of reports of crimes or irregularities of which they have become aware in the context of a public or private employment relationship."

### 3. Recipients of Your Personal Data

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To achieve the purposes listed above, we need to share your data with the following categories of recipients: banks, insurance companies, and consultants, who act as independent data controllers. Their involvement is necessary to carry out essential operations related to the use of our services (e.g., processing payments; delivering purchased goods).

Furthermore, contact details of external data processors performing activities in the interest of the Data Controller can be requested at the following email address: [compliance@hwgsababa.com](mailto:compliance@hwgsababa.com).

### 4. Transfer of Personal Data to a Third Country or an International Organization

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The Data Controller may transfer your personal data outside the European Economic Area ("EEA"). To safeguard your data in the context of international transfers, the Data Controller will implement appropriate safeguards, namely decisions of adequacy by the European Commission pursuant to Article 45 of the Regulation, standard contractual clauses approved by the European Commission, and contractual instruments providing adequate guarantees (Article 46 of the Regulation). Alternatively, transfers will take place in the presence of derogations provided for in Article 49 of the Regulation (e.g., data subject's consent, necessity of the transfer for contractual/pre-contractual measures, overriding public interest, the right to a legal defense, vital interests of the data subject or other individuals, data entered in a public register).

**Specifically regarding Whistleblowing reports via the My Whistleblowing Zucchetti platform:** the related processing takes place in Italy, and there is no activity of transfer or dissemination abroad or to

non-EU countries. No data is communicated or disclosed, except for statistical purposes, and in any case, in an anonymous and/or aggregated manner.

## 5. Methods of data processing

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The processing of your personal data is carried out by HWG Sababa with the aid of computer tools. The data will be stored on magnetic or paper media, always in compliance with the security requirements set out in the European Regulation and may be disclosed to the entities referred to in point 3 of this Privacy Policy.

**Specific to Whistleblowing reports:** personal data are processed both with automated/electronic tools and with manual tools for the purposes mentioned above. Specific security measures are implemented to prevent data loss, unlawful or incorrect uses, and unauthorized access.

HWG Sababa commits not to use reported data as inaccurate until the inaccuracy has been verified and, if existing, corrected.

## 6. Data subject rights

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As the data subject, you can exercise the rights guaranteed by the GDPR concerning your personal data by writing to [compliance@hwgsababa.com](mailto:compliance@hwgsababa.com). We commit to responding to your request as promptly as possible, but in any case, not later than 30 days from the receipt of your communication. We may request a copy of an identification document if, in relation to your request, it is necessary to verify your identity.

Among the rights guaranteed by the GDPR to the data subject are the following:

- The right of access, meaning the right to know if there is processing of personal data concerning you and, if confirmed, to obtain a copy.
- The right to obtain the rectification or integration of your data.
- The right to obtain the erasure of your personal data if they are no longer necessary for the purposes for which they were collected, or if we are no longer authorized to process them.
- The right to obtain the limitation of the processing of personal data in cases indicated by the GDPR.
- The right to data portability, meaning the right to receive personal data concerning you in a structured, commonly used, and machine-readable format, and the right to request that such data be transmitted to another data controller.
- The right to withdraw consent for processing based on it.
- The right to object at any time to the processing of your personal data based on our legitimate interest.

You also have the right to lodge a complaint with the competent data protection authority.

The contact details of external data processors acting in the interest of the Data Controller can be requested at the following address: [compliance@hwgsababa.com](mailto:compliance@hwgsababa.com).

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*We reserve the right to periodically update the content of this page. We encourage you to regularly check this information to stay informed about any changes made since your last visit.*