

PRIVACY NOTICE

PURSUANT TO ARTICLE 13 OF LEGISLATIVE DECREE NO. 196 OF 30 JUNE 2003 AND ARTICLE 13 OF THE GENERAL DATA PROTECTION REGULATION (EU) NO. 2016/679

In compliance with the Legislative Decree No. 196 of 30 June 2003 (Personal Data Protection/Privacy Code) and with the EU General Data Protection Regulation No. 2016/679 (GDPR), we hereby provide you with a special data privacy notice for the processing of personal data which you furnish to us. This Privacy Notice does not cover data processed by third party websites accessed from links on the website of the proprietor, and the latter accepts no liability of any kind in relation to those websites.

• TYPES OF DATA PROCESSED

Personal and identification data

Personal data shall mean any information or data pertaining to a natural person that is (or can be) identified, even indirectly, by reference to any other information, including a personal identification number; Identification data shall mean personal data that enables the data subject to be identified directly (for example, name, surname, date of birth, address, email address, telephone number, etc.).

Navigation data

The computer systems and software procedures used in the normal operation of this website gather personal data during that operation, whose communication and transmission is necessarily implied by the use of internet communication protocols. Such information is not collected in order to be associated with identified data subjects, but could by its very nature enable users to be identified by means of data processing operations, and also by association with data held by third parties. This category includes IP addresses or domain names of computers utilised by users who connect with the site, addresses in URI (Uniform Resource Identifier) notation of requested resources, the time the request is made, the method used to submit the request to the server, the file size obtained in response, the numerical code indicating the response status from the server (successful, error, etc.) and other parameters related to the user's operating system and computer environment.

For defence purposes in judicial proceedings

The Data Controller may use the User's Personal Data for defence purposes in legal proceedings or in the phases preparatory to the institution of such proceedings, in order to defend against the User's misuse (if any) of the latter or of the associated services. The data could potentially be used in order to determine liability in the event of computer crimes that damage the website.

Maintenance

The User's Personal Data may be processed in other ways and for other reasons associated with maintenance operations.

Data which the User voluntarily provides

The explicit, voluntary and optional transmission of emails to the addresses specified on this website, and/or the compilation of data gathering forms in the "Contacts" area, necessarily means that the sender's email address will be subsequently acquired as a precondition to replying to requests made, and any other personal data included will also necessarily be communicated/acquired.

Specific privacy notices

Specific privacy notices related to specific services or data processing operations for data provided by the User or by the data subject may be found on the different pages of the website.

• PURPOSES OF THE DATA PROCESSING FOR WHICH CONSENT IS GRANTED IF REQUIRED

Personal data voluntarily provided will be processed for the following purposes, until such time as the processing is objected to:

- browsing on this website;
- to send requests for information to the email addresses on the website's home page and in the "Contacts" area, and to receive replies from SCOTSMAN ICE S.r.l.;

- administrative and accounting activities in general. For the purposes of applying personal data protection provisions, data is processed for administrative and accounting purposes only if this is required in order to perform organisational, administrative, financial and accounting activities, irrespective of the nature of the data processed. More specifically, internal organisational activities pursue those purposes where they are instrumental to compliance with contractual and pre-contractual obligations, and with data privacy notice provisions.

- **COOKIES POLICY**

WHAT ARE COOKIES? Cookies are small text files sent from the website to the data subject's terminal (usually the browser), where they are stored before being retransmitted to the website when the same user next visits that website. A cookie cannot draw any other data from the user's hard drive or transmit computer viruses or gather email addresses. Each cookie is unique to the user's web browser. Certain functions of cookies may be assigned to other technologies. The term 'cookie' in this document refers to cookies, properly so called, and also to any similar or related technologies. With cookies it is possible to record information about your preferences, such as the pages you browsed or the downloading of files from our website or other similar activities engaged in while when browsing our website.

COOKIES MAY BE "FIRST PARTY" OR "THIRD PARTY". "First party" cookies are those that are developed by the website owner, whereas "third party" cookies are developed by third parties apart from the website owner.

TYPES OF COOKIES. There are various types of cookies:

Technical cookies

These cookies are used only to transmit a communication over an electronic communications network, or to the extent strictly necessary for the provider of an information society service which the subscriber or user specifically requests.

Technical cookies may be further subdivided as follows:

- navigation cookies or session cookies, which guarantee that the website can be browsed and used in the normal way (e.g. enabling one to make a purchase or to log in and access reserved areas); they are required in order for the website to correctly function;
- analytic cookies, which are treated as technical cookies where utilised directly by the site operator to gather information in aggregate form on numbers of users and the manner in which they visit the website, in order to improve website performance;
- functional cookies, which enable the user to browse the web based on a series of preselected criteria (e.g. language, products selected for purchase) in order to improve the service received.

Profiling cookies:

The purpose of profiling cookies is to create user profiles, and they are used in order to send ads that match the preferences expressed by the user as he/she browses the web.

COOKIES INSTALLED ON THIS WEBSITE

This website uses only technical cookies, and no profiling cookies, and therefore no profiling activities are carried out on visiting users.

DURATION OF COOKIES. Cookies' duration is determined by the date on which they expire (or by a specific action e.g. closing the browser) dictated by the settings at the time of installation. Cookies may be:

- temporary or session (session cookies): these are used to store temporary information, they enable the linking of actions performed during a specific session, and they are removed from the computer when the browser is closed;
- permanent (persistent cookies): these are used to store information e.g. the login name and password, so that the user doesn't have to type them in each time he/she visits a specific site.

They are stored on the computer even after the browser is closed.

After disconnection from this website, session cookies are not retained. The IT systems used for this site employ temporary cookies.

MANAGEMENT OF COOKIES. Cookies on the websites may be disabled by downloading special software applicable to your browser and disabling the use of individual cookies. Or "anonymous browsing" may be enabled: with this feature enabled, the web can be navigated without browsing data being retained. This function solely ensures that browsing data is not retained in the browser. Alternatively, it is possible to disable/delete cookies by accessing your browser's settings panel.

ACCEPTING AND REJECTING COOKIES. If you continue to navigate this website, you accept the

Cookies Policy and, consequently, cookies will be provided for in the settings and collected. If you reject cookies by abandoning the browsing session, any cookies already stored locally in your browser will remain there, but we will no longer be able to read or use them until the Cookies Policy is accepted at a later time. You will always be able to remove those cookies at any time, using the procedures mentioned above.

- **DATA PROCESSING METHODS - DATA RETENTION - SCOPE OF DATA COMMUNICATION AND DISSEMINATION**

Data processing operations will be carried out automatically and/or electronically and/or manually (i.e. hardcopy documents) - using procedures and tools whose purpose is to ensure optimum data security and confidentiality - by specially appointed data handlers in compliance with the regulatory provisions mentioned above. Personal data will not be retained for longer than the period dictated by the purposes for which they were initially gathered and subsequently processed, and they shall not in any case be retained for more than ten years.

Your processed data will not be disclosed/disseminated; they may, however, be communicated to companies that are contractually associated with SCOTSMAN ICE S.r.l. in conformity with and within the limits indicated in the regulatory provisions mentioned above.

- **NATURE OF THE PROVISION AND REFUSAL OF DATA**

Aside from the provisions that apply to browsing data, the user may consent or otherwise to the provision of personal data. The provision of personal data implicitly involved when transmitting requests for information to email addresses indicated on the website is necessary in order to process requests and to receive a response from the Data Controller. Failure to provide personal data may make it impossible to obtain information from SCOTSMAN ICE S.r.l.

- **DATA SUBJECTS' RIGHTS**

Please be informed that as data subject within the meaning of Article 7 of the Personal Data Protection/Privacy Code and Article 15 of the GDPR, you are entitled:

- to obtain confirmation as to whether or not personal data concerning you exist, whether or not they have being already registered on the system, and the communication of such data in intelligible form;
- to be informed: a) of the source of the personal data; b) of the data processing purposes and methods; c) of the logic applied to the processing where this is conducted using electronic means; d) of the identification particulars of the Data Controller, Data Supervisors and of the designated representative within the meaning of Article 5(2) of the Personal Data Protection/Privacy Code and Article 3.1 of the GDPR; e) of the entities or categories of entity to whom/which the personal data may be communicated and who/which may come to know/acquire said data in their capacity as designated representative(s) in the State's territory, Data Supervisors(s) or data processing operator(s);
- to obtain: a) the updating, rectification or, if interested, the supplementation of the data; b) the erasure, anonymization or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they were collected or subsequently processed; c) certification that the operations referred to in letters a) and b) were notified, also specifying to their content, to the persons/entities to whom/which the data were communicated or disseminated, unless this requirement proves impossible or involves manifestly disproportionate efforts in comparison with the right to be safeguarded;
- to object, in whole or in part: a) on legitimate grounds, to the processing of personal data concerning the data subject, even if such data is relevant to the purpose of the data collection; b) to the processing of personal data concerning the data subject, if done for the purpose of transmitting advertising or direct sales materials or conducting market research or carrying out commercial communications, by using automated call systems without an operator, e-mail and/or using traditional marketing methods by telephone and/or the postal services. Note that the data subject's right of objection referenced in letter b) above in connection with direct marketing using 5automated methods extends also to traditional marketing methods, and that the data subject may also exercise his/her

right to object to the data processing in part only. The data subject may, therefore, decide that he/she wishes only to receive communications in the traditional way, or automated communications only, or neither of these two communications methods.

You will also, where applicable, be entitled to exercise the rights indicated in Article 16-21 of the GDPR (right to data correction, right to be forgotten (data), right to have the data processing restricted, right to data portability, right to make a complaint to the Italian Data Protection Authority).

- **HOW DATA SUBJECTS CAN EXERCISE THEIR RIGHTS**

You may exercise your rights at any time by sending:

- a registered letter with proof of receipt to the Data Controller, SCOTSMAN ICE S.r.l., with registered office in Via Lainate, n. 31 - Pogliano Milanese (MI);
- an e-mail to info@scotsman.it.

- **MINORS**

This website and the Data Controller's services are not provided to minors under the age of 18, and the Data Controller does not intentionally gather personal information pertaining to minors. If information pertaining to minors is unintentionally acquired/recorded, the Data Controller will promptly erase such information at the request of the users in question.

- **CHANGES TO THE PRIVACY POLICY**

The Data Controller reserves the right to change, update, add or remove parts of this privacy policy at its discretion, at any time. The data subject is required at regular intervals to check any changes made. The privacy notice will specify the date on which it is updated, in order to facilitate the aforementioned checks. The use of the website after the publication of those changes shall constitute acceptance thereof.

- **DATA CONTROLLER, DATA SUPERVISOR AND DATA PROCESSING OPERATORS**

The Data Controller within the meaning of the aforementioned regulations, is **SCOTSMAN ICE S.r.l.**, with registered office in Via Via Lainate, n.31 - Pogliano Milanese (MI), as represented by its *pro-tempore* legal representative.

The **Data Processor**, within the meaning of the regulatory provisions mentioned above, is the IT consultancy company appointed by the Data Controller in order to administer, operate and update the website.

The updated list of **data processors and data processing operators** is kept at the Data Controller's registered office. To receive the full list, please contact the Data Controller at the company's registered office.