

## PRIVACY POLICY

Please, carefully read this policy before submitting any personal information. It has been prepared pursuant to Art. 13 et seq. of Regulation (EU) 2016/679 (GDPR) and contains important information on the processing of your Personal Information. The Data Controller will process your Personal Information in compliance with the *Privacy Law* and the principles of lawfulness, fairness, transparency, purpose limitation and storage, data minimization, accuracy, integrity, confidentiality. The following information is therefore provided by the Data Controller.

### 1. DATA CONTROLLER

The Data Controller is **BROOKLIN S.r.l.**, Via XI Febbraio, 27, 50053 Empoli (Florence, Italy), tel. +39 0571 73041, email: [brooklyn@brooklyn.it](mailto:brooklyn@brooklyn.it), PEC [certified email] [brooklyn@pec.it](mailto:brooklyn@pec.it)

- VAT No. IT01703650489, as legally represented.

### 2. PURPOSES, LEGAL BASIS OF THE PROCESSING, AND NATURE OF THE PROVISION

Your Personal Data will be processed for the following purposes:

**2.1 Browsing the website.** The processing is necessary for the pursuance of the Controller's or third party's legitimate interests, provided that the interests or fundamental rights and freedoms of the Data Subject requiring the protection of Personal Data do not prevail (Art. 6, paragraph 1, letter f, of the GDPR and Recital 47), taking into account the reasonable expectations of Data Subjects based on their relationship with the Controller. Providing Personal Data is necessary; failure to provide it will make it impossible to obtain or use the services requested from the Data Controller.

**2.2 Contact request using the “Contacts” form** The legal basis is the execution of a contract to which the Data Subject is a party or the execution of pre-contractual measures adopted at the request of the Data Subject (Art. 6, par. 1, letter b of the GDPR). Providing Personal Data is necessary for the provision of the services requested by the Data Subject. Failure to provide Personal Data will make it impossible to obtain or use the services requested from the Data Controller.

**2.3 Soft-spam.** These activities are allowed in the context of a purchase to allow the Data Controller to offer products similar to those already purchased directly, provided that the Data Subject does not oppose against that processing with the methods provided for in this Policy. The legal basis of the processing is the legitimate interest of the Data Controller, which may be considered equivalent to the interest of the Data Subject to receive soft-spam communications pursuant to Art. 130, paragraph 4, of Legislative Decree no. 196/2003 and subsequent amendments. The provision of Personal Data is optional and does not preclude processing for other purposes.

**2.4 Newsletter.** The Data Subject consented to the processing of their Personal Data (under Art. 6, par. 1(a) of the GDPR). This consent can be revoked at any time (without prejudice to the processing performed until that revocation). The provision of Personal Data is optional and does not preclude processing for other purposes.

**2.5 Marketing.** The Data Subject consented to the processing of their Personal Data (under Art. 6, par. 1(a) of the GDPR). This consent can be revoked at any time (without prejudice to the processing performed until that revocation). The provision of Personal Data is optional and does not preclude processing for other purposes.

**2.6 Organizational management of the agreement, including payments and billing.** Execution of a contract to which the Data Subject is a party (pursuant to Art. 6, par. 1, letter b of the GDPR). Providing Personal Data is necessary; failure to provide it will make it impossible to obtain or use the services requested from the Data Controller.

**2.7 Compliance with legal, accounting, administrative, and tax obligations.** The fulfilment of legal obligations by the Data Controller (pursuant to Art. 6, par. 1, letter c of the GDPR). Providing Personal Data is necessary; failure to provide it will make it impossible to obtain or use the services requested from the Data Controller.

### **3. RECIPIENTS OF PERSONAL INFORMATION**

The Personal Information processed by the Data Controller will not be disclosed. In any case, your Personal Data may be shared with: (a) persons who may access Personal Data under national or Community legal provisions of the Country of the Data Controller; (b) data processors duly appointed in accordance with Art. 29 GDPR and Art. 2-*quaterdecies* of Leg. Dec. no. 196/2003 and subsequent amendments.; (c) parties processing Personal Data on behalf of the Data Controller, appointed as data processors with a contract or other legal deed pursuant to Art. 28 of the GDPR.

### **4. DATA TRANSFER**

Personal Data is managed and stored on servers located within the European Union belonging to the Controller and/or third parties duly appointed as Data Processors. Personal Data will not be transferred outside the European Union. Obviously, the Data Controller may transfer the location of the servers to Italy and/or the European Union and/or non-EU countries if necessary. In such a case, the Data Controller shall ensure that the transfer of non-EU Personal Data is made in compliance with the applicable legal provisions by signing, if necessary, agreements that ensure an adequate level of protection and/or by adopting the standard contractual clauses required by the European Commission.

### **5. DATA RETENTION PERIOD**

Personal Data will be processed by the Data Controller only to the extent necessary for the pursuit of the purposes for which they were collected; more specifically, your Personal Data will be stored until your consent is revoked. In particular, Personal Data will be processed for a period of time equal to the minimum necessary, as indicated in Recital 39 of GDPR 2016/679, without prejudice to an additional retention period that may be imposed by law, as also provided for in Recital 65 of GDPR 2016/679.

### **6. DATA SUBJECT RIGHTS, COMPLAINTS, JUDICIAL REMEDY**

The Data Subject, or a proxy appointed in writing, may exercise the following rights: (a) right of access, pursuant to Art. 15 of GDPR 2016/679; (b) right of rectification, pursuant to Art. 16 of GDPR 2016/679; (c) right to be forgotten, pursuant to Art. 17 of GDPR 2016/679; (d) right to restrict processing where one of the hypotheses provided for in Art. 18 of the GDPR 2016/679 applies; (e) right to require attestation that the operations carried out under Art. 16, 17 and 18 of the GDPR 2016/679 has been brought to the attention of those to whom the data have been disclosed, including as regards their content, except where such compliance proves impossible or involves a manifestly disproportionate

use of means in relation to the protected right; (f) right to data portability, pursuant to Art. 20 of GDPR 2016/679; (g) right to object to the processing of Personal Data, pursuant to Art. 21 of GDPR 2016/679; (h) right to withdraw consent at any time, as set out in Art. 7 of GDPR 2016/679; (i) right to lodge a complaint with a supervisory authority, pursuant to Art. 77 of GDPR 2016/679; (l) ) right to seek judicial remedy, pursuant to Article 79 of GDPR 2016/679.

If you wish to exercise your rights, you can contact the Data Controller using the contact details provided in this Policy drawn up in accordance with the applicable Privacy Law. In addition, the list of Data Processors is available at the registered office of the Data Controller and you can request it from one of the contacts provided in point 1 of the Policy called “DATA CONTROLLER”. The Data Controller remains available for any clarification and, should any change be made to the processing methods compared to the methods described in this document, the Data Controller will provide an updated Policy.

## **COOKIE POLICY**

This Cookie Policy is an integral part of the Privacy Policy of **BROOKLIN S.r.l.** Via XI Febbraio, 27 - 50053 Empoli (Florence, Italy), tel. +39 0571 73041, email: [brooklyn@brooklyn.it](mailto:brooklyn@brooklyn.it), PEC [certified email]: [brooklyn@pec.it](mailto:brooklyn@pec.it)

- VAT No. IT01703650489, as legally represented.

### **1. DEFINITIONS AND CHARACTERISTICS OF COOKIES**

Cookies are fragments of text files that Internet websites and applications send on their first visit to the terminal, so that they are stored and then transmitted back to the same websites on the next visit.

Users who view the website will see minimum amounts of information placed in the devices they use, whether they are computers or mobile devices, within specific directories used by the web browser. In fact, cookies collect some information about the use the visitor makes of a given site (e.g., how many and which pages you visited, how long you remained in that website, from which channel you arrived at the website, etc.).

This information is generic and cannot be associated with identified or identifiable persons.

There are different types of cookies that, depending on their features and functions, may persist on your device for different periods of time:

- A. session cookies, which are automatically deleted when the browser is closed;
- B. persistent cookies, which remain on your device for a pre-established period of time.

### **Existing cookie types**

- **Technical** cookies:

- o **session** or **browsing** cookies, which are automatically deleted when the browser is closed
- o **analytics** cookies
- o **functionality** cookies

- profiling cookies
- **third-party** (and **first-party**) cookies

## 2. TYPES OF COOKIES USED BY THIS WEBSITE

While browsing this website, you will receive the following cookies:

A. **Technical cookies** – they provide the user with certain functionalities that facilitate browsing, e.g. those used for the sole purpose of transporting communication through an electronic communication network or that are strictly necessary to provide a service expressly requested by the user.

In particular, pursuant to Art. 122, par. 1, of Legislative Decree 196/2003 and subsequent amendments., technical cookies are used for the sole purpose of “*transmitting communication over an electronic communication network or to the extent strictly necessary to the provider of an IT company service explicitly requested by the subscriber or user to provide that service.*”

Technical cookies are, for example, those that allow you to:

- o access your profile without having to log in each time;
- o find products you added to a cart even after several days;
- o select the language you want to use to browse the website without having to select it each time.

B. **Third-party** cookies – they are installed when you visit our website, but using IT systems not under our direct control and for purposes and methods of processing over which we likewise have no direct control.

*Google Analytics*, for example, uses the domain “google-analytics.com” to install cookies and processes data on its servers. So, every time we use a service operated by someone other than us, we are using a third-party service and the cookies used by this service are automatically qualified as “third-party cookies.”

This Website processes such Personal Information for the sole purpose of processing anonymous statistical information on the use of the website and to verify the correct operation of the website.

Google, as Data Controller, may also transfer this information to third parties, where required to do so by law or where such third parties process the information on Google's behalf.

You can read Google's Privacy Policy concerning the Google Analytics service, on the website <https://support.google.com/analytics/answer/6004245?hl=it>.

To learn more about Google's Privacy Policy, please visit <http://www.google.com/intl/it/privacy/privacy-policy.html>.

## 3. HOW TO VIEW AND CHANGE COOKIES VIA YOUR BROWSER

You can opt-out of the use of cookies through specific features of your browser or through third-party add-ons. However, disabling technical cookies on the website may mean that some of the services or features of the website will not be available or may not work properly and you may be forced to change or manually enter certain information each time you visit.

Alternatively, you can disable only Google Analytics cookies by using the external opt-out add-on (<https://tools.google.com/dlpage/gaoptout>) provided by Google for major browsers.

For more information on how to set your preferences for the use of cookies via your browser, please see the following instructions:

Internet Explorer: <https://support.microsoft.com/it-it/topic/eliminare-e-gestire-i-cookie-168dab11-0753-043d-7c16-ed5947fc64d>; Firefox: <https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop?redirectslug=enable-and-disable-cookies-website-preferences&redirectlocale=en-US>; Safari: <https://support.apple.com/it-it/guide/safari/sfri11471/mac>; Chrome: <https://support.google.com/chrome/answer/95647?hl=en>.

#### **4. SOCIAL NETWORKS**

You may interact with social networks and other external platforms through this Website. In any case, the interactions and information acquired from this Website are regulated by your privacy settings for each social network.

Please note that data collected through those widgets could be transferred to countries outside the EU, in particular the United States. In this case, processing will be carried out in compliance with the conditions set out in the GDPR, ensuring adequate levels of protection of Personal Information. The following are the main social media services integrated into the Website:

##### **- Facebook social widgets (Meta Platforms, Inc.)**

- o **Personal Information processed:** cookies and usage data.
- o **Place of processing:** United States
- o **Privacy policy:** <https://www.facebook.com/privacy/explanation>

##### **- Instagram social widgets (Meta Platforms, Inc.)**

- o **Personal Information processed:** cookies and usage data.
- o **Place of processing:** United States
- o **Privacy policy:** <https://help.instagram.com/1896641480634370>

##### **- X social widgets (X Corp.)**

- o **Personal Information processed:** cookies and usage data.
- o **Place of processing:** United States
- o **Privacy policy:** <https://twitter.com/it/privacy>

##### **- YouTube social widgets (Google LLC)**

- o **Personal Information processed:** cookies and usage data.
- o **Place of processing:** United States
- o **Privacy policy:** <https://policies.google.com/privacy>

For further details on the processing of Personal Information and the exercise of your rights (access, rectification, erasure, restriction, opposition, portability), please read the Privacy Policy of **BROOKLIN S.r.l.**