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CUSTOMER NOTICE PURSUANT TO GDPR REGULATION 2016/679

Dear Customer, in compliance with EU Reg 2016/679 on the protection of individuals with regard to the processing of personal data and the free movement of such data, the Data controllers are required to provide Customers (hereinafter referred to as "data subjects") with certain information regarding the use of personal data.
Pursuant to Article 26 of the European Regulation 2016/679 Abitare Co. S.r.l., Abitare Servizi Immobiliari S.r.l., Riabitare Co S.r.l. and Abitare Commercial S.r.l., companies of the Abitare Group, following internal agreement, recognize and present themselves as Joint controllers of the processed data, in the light of joint means and purposes of processing. According to the indicated legislation, such processing will be based on the principles of fairness, lawfulness and transparency and the protection of your privacy and your right to protection of personal data. Pursuant to Article 13 of the European Regulation 2016/679, therefore, we provide you with the following information:

1) **Purpose of the processing for which the data are intended.**

Personal data are processed as part of the normal professional, managerial, promotional activities of the aforementioned Joint controllers according to the following purposes:

a) purposes strictly related and instrumental to the management of the professional relationship, such as:

- all activities inherent and instrumental to the proper management and execution of tax and accounting obligations; management and execution of any contracts; administration and management of payments;
- sending of informative documentation or referring to the commercial and administrative practices mentioned above;
- compliance with EU and national regulations (DM 3.2.2006 No. 143 Anti-Money Laundering);
- Communications of the data of the data subject to natural and/or legal persons (construction companies, firms, suppliers, subcontractors) necessary for the task of the entrusted assignment such as:
  - Management of variants, choice of finishes and installations, customization of the apartment, etc. as provided in the specifications;

  The Data controllers undertake to provide exact communication of the suppliers to whom only the personal and contact data of the data subject have been disclosed.
- Communication of the data subject's data to natural and/or legal persons operating within the scope of related activities, necessary for the task of the entrusted assignment (such as those relating to carrying out hypocatastical surveys) and/or for the purpose of entering into insurance policies to cover the risks inherent in the transaction subject to assignment;

b) functional to the activity of the aforementioned Joint controllers, such as:

- data processing for the performance of promotional, commercial, administrative practices and/or arising from legal obligations;
- information on initiatives promoted by the Data controllers;
- information, through periodic sending of press reviews, on real estate market trends and in general on the real estate sector;
- promotions of services and/or products offered by the Joint controllers.

2) Personal data and sources

The data being processed are provided in accordance with this policy; they are collected from our office by interview or from the data collection forms on our website. These data may be correlated in order to derive additional profiled information for internal statistical purposes. Personal data from publicly accessible sources will not be processed.

3) Methods of data processing.

Personal data are processed as part of the normal professional, managerial and promotional activities of the Data controllers in relation to the aforementioned purposes by means of manual, computerized and telematic tools with logics strictly related to the purposes themselves and, in any case, in such a way as to guarantee the security and confidentiality of the data. In particular, the processing will take place by means of paper tools, automated logic and use of CRM-type management software that will allow the best management of the fulfillment of contractual obligations; the data will also be stored and processed at a platform owned by Abitare Co. S.r.l., accessible to the user via user and password, which allows the sharing of information and documents between customer and seller. With regard to personal data processed for marketing purposes, the processing will be carried out using automated business information sending software.

4) Provision and refusal to provide data.

The provision of common personal and identifying data for the purposes mentioned in point 1 a) is strictly necessary for the purpose of carrying out the professional assignment. Each Client has the right to refuse his/her consent for the subsequent points without jeopardizing the main service in question. In this case, it is warned that the Holders may not disclose such data to other parties, nor may they disseminate them.

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5) Communication of data.

Without prejudice to the communications made in compliance with legal obligations, the data may be communicated, exclusively for the purposes indicated in point 1 a), in Italy or abroad, to the following categories of collaborators or outsiders:

- business agents in mediation (also companies) identified by the Data controllers in order to collaborate for the completion of the task entrusted by the data subject;
- banks and/or credit and financial institutions and/or other agents operating in the credit field, Banking Institutions;
- companies and/or professionals who perform services for the completion of technical / cadastral / building / urban planning practices;
- notaries in order to prepare notarial acts and/or related activities pertaining to the assignment given to the Data controllers;
- insurance companies in order to conclude policies pertaining to the assignment conferred to the Data controllers;
- Independent collaborators of our company, whose collaboration is necessary to complete and fulfill the service in question;
- Professionals and consultants, whose collaboration is necessary to complete and fulfill the service in question;
- Anyone who is a legitimate recipient of communication for the aforementioned

purposes mentioned in point 1 a); Any other processing purposes will be subject to specific consent from you and not otherwise processed.

6) Retention period

Data will be processed for the entire duration of the contractual relationships established at the end of which storage will be limited to the data necessary for the fulfillment of all legal obligations. The data processed for the purposes of point 1 b) will be retained for the entire period of loyalty. In case of inactivity of the data subject for 5 years, contact data will be deleted in January of the sixth year since the last recorded interaction.

7) Profiling.

The data provided may be subject to an automated profiling process aimed at processing functional statistics to improve our service and offers. The Joint controllers, in order to proceed with the profiling of your data, ask for your express consent.

8) Transfer of data abroad.

Personal data may be transferred to countries of the European Union and to countries outside the European Union within the scope of the purposes indicated in point 1, but only after verification of the presence of an adequacy decision by the Commission or under standard contractual clauses as provided for by the Regulation in art. 46.

9) The Data Protection Officer.

Data controllers have appointed a Data Protection Officer (also called Data Protection Officer) who can be contacted for any information or requests at dpo@ecoconsult.it.

10) Rights under Articles 15 to 22.

Articles 15 to 22 of the aforementioned Regulations give the data subject rights regarding access to his or her data, deletion, rectification, revocation, restriction and portability of his or her data. In particular, the data subject may obtain confirmation of the existence or non-existence of his or her personal data and request that such data be made available to him or her in an intelligible form. The data subject may also request to know the origin of the data as well as the logic and purposes on which the processing is based; to obtain the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, as well as the updating, rectification or, if there is interest, the integration of the data; to oppose, for legitimate reasons, the processing of the same.

The Data controllers of personal data are the Abitare Group companies in a Joint Control relationship: **Abitare Co. S.r.l.**, **Abitare Servizi Immobiliari S.r.l.**, **Abitare Commercial S.r.l.**, with registered office in Milan at Monte Napoleone, 8 and **Riabitare Co S.r.l.** with registered office in Milan at Largo Francesco Richini, 2/A.