PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

Regulation (EU) 2016/679 (General Data Protection Regulation, hereinafter GDPR) provides for the protection of natural persons with regard to the processing of personal data. Under this legislation, the processing of personal data relating to a person, specifically referred to as the 'data subject', is based on the principles of fairness, lawfulness and transparency, as well as on the protection of confidentiality and of the rights of the data subject.
This notice is intended to inform you, in compliance with the above-mentioned legislation, that in relation to the relationship you have with our organisation as a Customer, our organisation holds certain data concerning you, which have been acquired, including verbally, directly or through third parties that carry out transactions concerning you or that, in order to fulfil one of your requests, acquire and provide us with information.
Pursuant to the GDPR, since such data are information relating to you, they must be classified as 'personal data' and must therefore benefit from the protection provided for by those provisions.
Our organisation, as Data Controller, will process the personal data provided by you in compliance with the applicable legislation and with the utmost care, implementing effective procedures and management processes to ensure the protection of the processing of your personal data. To this end, the Data Controller, using physical and management procedures designed to safeguard the data collected, undertakes to protect the information provided so as to prevent unauthorised access or disclosure, maintain data accuracy and ensure the appropriate use of such data.

Data Controller
The Data Controller is: Zephyr Group srl | VAT No. IT00752690115
Via Privata Oto 10, 19136 La Spezia Italy email: privacy@zephyr-group.eu.
Personal data collected
The Data Controller uses your personal data in the course of its business activities.
The following data may be requested from you, even only in part:

- personal details, tax code, VAT number, company name, registered office, residence and domicile, and contact details;
- data relating to the contractual relationship describing the type of contract, as well as information relating to its performance and necessary for the fulfilment of the contract itself;
- data aimed at defining more clearly the relationship with our organisation and making our collaboration and operational efficiency more effective;
- data relating to your employees and/or collaborators and information concerning their profession.

Purposes of the processing for which the personal data are intended
The main purpose of the processing of your personal data that the Data Controller intends to carry out is to enable the proper establishment and/or development, as well as the correct administration, of the business relationship.

In particular, the purposes of the processing are as follows:
Contractual Purposes:

- to allow the Customer to request, obtain, access and use the services provided by the Company;
- to comply with obligations arising from laws, regulations or EU legislation (e.g. tax and accounting obligations);
- to manage customers (customer administration; administration of quotations, contracts, orders, shipments and invoices; verification of reliability and solvency);

Legitimate Interest Purposes:

- to manage disputes in order to assert and defend its rights, including within debt collection and debt assignment procedures, also through third parties;
- to manage internal control services (security, productivity, service quality, integrity of assets);

Marketing Purposes

- Management of sales and marketing activities (promotion of services, market analyses and surveys, promotional activities and measurement of satisfaction levels, business references, etc.).

- measurement and improvement of the effectiveness of commercial communications sent by e-mail through tracking pixels (see section ‘Tracking tools in e-mail communications’).

Retention periods for your data
The data will be retained for the period necessary to pursue the purposes for which such data were collected, as stated in this notice. In any event, the following retention periods will apply with reference to data processing for the purposes set out below:

- for Contractual and Legitimate Interest Purposes, the data are retained for a period equal to the duration of the supply of the services and/or products requested by the Customer and for 10 years following termination of the supply, without prejudice to any renewals and to cases where retention for a longer period is required for any disputes, requests from competent authorities or pursuant to applicable legislation;
- for Marketing Purposes, the data are retained for a period equal to the duration of the provision of the services requested by the Customer and for a period of 24 months following the last contact with the Customer, which shall include, among other things, use of a service provided by the Company or the opening of a newsletter (the latter detected only where tracking has not been disabled by the data subject).
- for e-mail tracking data (tracking pixels), data relating to the individual data subject are retained for 12 months from detection and are subsequently deleted or anonymised in aggregate form; in the event of withdrawal of consent to tracking or unsubscription, collection ceases immediately and individual data already collected are deleted within 30 days, without prejudice to retention of evidence of the choices expressed by the data subject for the duration of the relationship and for the following 24 months.

Legal Basis of Processing: Mandatory or optional nature of providing data and consequences of any refusal
Data processing is necessary with reference to the Contractual Purposes, since such data are necessary in order to:

• provide the requested services and/or products,
• comply with the provisions of the applicable legislation

Should the Customer decide not to provide the data necessary for the Contractual Purposes, the Company will be unable to provide the requested services.
The processing of data for Legitimate Interest Purposes is carried out in pursuit of the legitimate interest of the Data Controller, which is fairly balanced against the Customer’s interests, rights and freedoms, since the data processing activity is limited to what is strictly necessary to carry out the operations indicated therein. Processing for Business Legitimate Interest Purposes is not mandatory and the Customer may object to such processing in the manner set out in this notice; however, should the Customer decide to object to such processing, the data may not be used, except where the Data Controller demonstrates compelling legitimate grounds that override such objection or grounds relating to the establishment, exercise or defence of a legal claim.
The data collected for processing for Marketing Purposes are not essential for the performance of the contractual relationship and must be classified and considered as supplementary information; providing them, where requested, is optional.
However, any refusal by you to provide such data will result in reduced efficiency of our organisation in managing relationships with third parties.
Processing for Marketing Purposes is based on the consent of the data subject (Art. 6(1)(a) GDPR and Art. 130 of Italian Legislative Decree 196/2003 – Privacy Code) or, for communications sent to the e-mail address provided in the context of the sale of a product or service concerning similar products or services, on Art. 130(4) of the Privacy Code, unless the data subject objects, which may be done at any time, free of charge and through simple procedures. The processing of e-mail tracking data is based on consent, as indicated in the section ‘Tracking tools in e-mail communications’.

Tracking tools in e-mail communications (tracking pixel / web beacon)

Commercial communications sent by e-mail by the Data Controller may contain tracking pixels (also known as web beacons): very small, generally 1x1 pixel, invisible images that are downloaded from the servers of the Data Controller or of the sending platform provider when the data subject’s e-mail program loads the images contained in the message. The use of these tools falls within the scope of Art. 122 of the Privacy Code, as clarified by the Italian Data Protection Authority with Decision No. 284 of 17 April 2026 (Official Gazette No. 98 of 29 April 2026).

Data collected. Through tracking pixels, the following data may be detected in association with a recipient identifier:

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- usage data: whether the message was opened, date and time of each opening, number of openings;
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- technical data relating to the device and connection: IP address, type of device, operating system, e-mail program used (user agent) and approximate location inferred from the IP address.

Tracking pixels do not allow access to the contents of the mailbox, other messages, files or other information stored on the data subject's device. The identifier associated with the pixel is non-sequential and unintelligible; the e-mail address is not included in the pixel download request.

Purposes and legal basis. Tracking data are processed to measure and improve the effectiveness of commercial communications (open rates, sending times and frequency, quality and relevance of content). The legal basis is the consent of the data subject (Art. 6(1)(a) GDPR and Art. 122 of the Privacy Code), which may be expressed together with consent to commercial communications. For addresses already included in the Data Controller's lists, processing continues under the transitional regime provided for by Decision No. 284/2026: this notice is provided with the first useful communication and the data subject may withdraw consent to tracking only at any time while continuing to receive commercial communications.

Consent is not required for measurement carried out exclusively in aggregate and anonymous form (the same pixel for all recipients of the same campaign, with anonymisation of the IP address and client data), nor for service, security or informational communications required by law. Communications through which the Data Controller provides this notice do not contain individual tracking pixels.

Parties involved. Tracking data are processed on behalf of the Data Controller by the provider of the e-mail sending platform [provider name], appointed as Data Processor pursuant to Art. 28 GDPR. For any processing outside the European Economic Area, please refer to the section 'Transfer of personal data abroad'.

Management of preferences and opt-out. The data subject may at any time, free of charge:

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- disable tracking only: via the 'Manage tracking preferences' link at the bottom of each commercial e-mail, or by writing to privacy@zephyr-group.eu. The data subject will continue to receive commercial communications without individual tracking pixels;
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- stop receiving all commercial communications: via the 'Unsubscribe' link at the bottom of each commercial e-mail, or by writing to marketing@zephyr-group.eu. Unsubscribing also results in the termination of all tracking;
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- block the automatic loading of images in the settings of their e-mail program: this measure prevents the activation of pixels, but indiscriminately blocks all images in messages and does not replace the previous options.

Requests are implemented without undue delay and in any event within 2 working days of receipt. The Data Controller records and retains the choices expressed by the data subject (Art. 7(1) GDPR). Refusal or withdrawal of tracking does not entail any limitation on the use of the services or on the business relationship; withdrawal does not affect the lawfulness of processing carried out before such withdrawal. Retention periods and the rights of the data subject are indicated in the sections 'Retention periods for your data' and 'Rights of the Data Subject'.

Methods of processing

We wish to inform you that the personal data you provide will be recorded, processed and stored in our paper and electronic archives, in compliance with appropriate technical and organisational measures.
The processing of personal data will be carried out using tools and procedures suitable to ensure their security and confidentiality and may be performed, directly and/or through delegated third parties, either manually using paper media or with the aid of IT systems or electronic tools.

Activities that may be outsourced

In carrying out its activities, the Data Controller may occasionally request other operators to perform certain services on its behalf, such as data processing services or other services; services necessary for the performance of the requested operations or services; shipping and deliveries; accounting records; administrative activities. Where the operator

delegated by the Data Controller to perform certain activities is a company providing payment, collection and treasury services, banking and financial intermediation, the following services may be carried out: bulk processing relating to payments, bills, cheques and other instruments; transmission, enveloping, transport and sorting of communications; document archiving, financial risk assessment; fraud prevention; debt collection. The above operators will be provided exclusively with the information necessary to provide the commissioned services and will be required to maintain confidentiality, prohibiting the use of the data provided for any purpose other than that agreed. Operators who are not persons authorised by us to process personal data will be appointed as Data Processors and will process the data only to the extent strictly necessary to provide the commissioned service and exclusively for that purpose, and they will themselves ensure that their authorised personnel have signed a confidentiality agreement.

Transfer of personal data abroad - The data provided by you will be processed only in Italy. Should your data be processed, during the contractual relationship, in a country outside the EU, the rights granted to you by EU legislation will be guaranteed and you will be promptly informed. Where the provider of the e-mail sending platform processes data outside the European Economic Area, the transfer will take place on the basis of an adequacy decision of the European Commission (Art. 45 GDPR) or standard contractual clauses (Art. 46 GDPR).

Scope of persons who may have access to your data
The following categories of persons appointed by the Data Controller as processors or persons authorised to process the data may become aware of your data:

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- Our employees or collaborators
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- Consultants appointed to provide consultancy, assistance or services to our organisation;
  Directors and members of supervisory bodies;
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- Business partners

Personal data may also become known to parties under agreement with the Data Controller, indicated in the paragraph entitled ‘Methods of processing’. The Data Controller may delegate to such parties the performance of specific obligations or particular acts necessary for the execution of the relationship with the data subject.

Communication and disclosure
Your data may be communicated, meaning made known to one or more identified parties, by the Data Controller outside the company in order to comply with all necessary legal and/or contractual obligations. In particular, your data may be communicated to:

1.
2. other companies of Zephyr Group srl, including parent companies, subsidiaries and affiliated companies;
3.
4. Public Bodies or Offices or supervisory authorities in connection with legal and/or contractual obligations;
5.
6. banks and/or credit institutions for the management of payments arising from the contractual relationship.

Your data may be communicated by the Data Controller:
to parties that may access the data pursuant to provisions of law, regulations or EU legislation, within the limits laid down by such rules;

to parties that need to access your data for purposes ancillary to the relationship between you and us, within the limits strictly necessary to carry out such ancillary tasks (including, by way of example, credit institutions and freight forwarders);

to our consultants and/or professionals, within the limits necessary to carry out their assignment within our or their organisation, subject to our appointment of them as processor imposing duties of confidentiality and security.

In any event, your data will not be communicated except to operators for the performance of acts relating to the fulfilment of relationships that may arise with the Data Subjects to whom the data refer.
Disclosure - The Data Controller will not indiscriminately disclose your data or, in other words, make them known to unspecified parties, including by making them available or allowing consultation.

Rights of the Data Subject

You have the right to obtain confirmation as to whether or not personal data concerning you are being processed, even if not yet recorded. The exercise of rights is subject to verification of the identity of the data subject, following identity checks (identity document or other documentation).

You may exercise at any time the rights provided for by the GDPR, including:

- receive confirmation of the existence of the data and access their content (right of access);
- update, amend and/or correct the data (right to rectification);
- request erasure or restriction of the processing of Data processed in breach of the law, including data whose retention is no longer necessary in relation to the purposes for which they were collected or otherwise processed (right to erasure and right to restriction);
- object to processing (right to object), including the right to object at any time to processing for direct marketing purposes, including only tracking through tracking pixels (Art. 21(2) and (3) GDPR);
- withdraw consent, where given, without affecting the lawfulness of processing based on consent before its withdrawal;
- not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you (Art. 22 GDPR);
- lodge a complaint with the supervisory authority (Italian Data Protection Authority, www.garanteprivacy.it) in the event of a breach of personal data protection legislation, by following the instructions provided at the following website:
  https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524;
  https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524;
- receive a copy in electronic format of the data concerning you, in order to transfer them to yourself or to another service provider, where the Company processes such data on the basis of your consent or on the basis that the processing is necessary for the provision of the requested services and/or products and the data are processed by automated means (right to data portability). Where the data are transferred to a third country or an international organisation, you have the right to be informed of the existence of safeguards.
  You have the right to request from the Data Controller the rectification or erasure, including partial erasure, of personal data, or restriction of the processing of personal data concerning you, or to object, in whole or in part, to their processing.

  To exercise these rights, you may contact our organisation, 'Data Controller', at info@zephyr-group.eu or, for commercial communications and e-mail tracking, at privacy@zephyr-group.eu and marketing@zephyr-group.eu, or by calling 0187 502341. The Data Controller will respond without undue delay and in any event within one month of receipt of the request (Art. 12(3) GDPR).