

PRIVACY AND COOKIE POLICY

Information pursuant to EU Regulation 2016/679 ("GDPR")

With this notice, made pursuant to the European Regulation (EU) 2016/679 regarding the protection of personal data (hereinafter "GDPR"), the company **Sport Digital House S.r.l.** (hereinafter, "Company" or "Data Controller"), as the data controller, wishes to inform users (hereinafter also "Data Subjects") who visit the websites: **www.sportdigitalhouse.it**; **www.oiesports.it**; **www.sportsponsorhub.it**; **www.emazegaming.it** e **www.emazegaming.com** (hereinafter also "Sites") about the methods of processing the data collected and the respective rights of the data subjects.

The notice is provided only for the aforementioned sites and not for other sites that may be consulted by the user via links and/or connections present on the same sites, including any connections to external social networks. For these sites, the processing will be governed by the Policies provided by the respective Data Controllers.

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SECTION I – PRIVACY POLICY

1. The Data Controller

The Data Controller pursuant to the GDPR is the Company:

Sport Digital House S.r.l.
Tax Code / VAT No. 10595330969
Via Dino Compagni n. 2
20131 - Milan
Italy

The processing will take place at the company's registered office also through the use of IT tools.

For any information regarding the processing of data or to exercise their rights, data subjects can contact the data controller via:

- email: info@sportdigitalhouse.it;
- certified email (PEC): sportdigitalhouse@pec.it;
- phone number: +39 3385791040.

The data controller has not appointed a Data Protection Officer (DPO).

2. The categories of personal data processed

Personal data means all information relating to an identified or identifiable natural person. The Sites process the data listed below.

2.1 Browsing Data

The Sites collect personal data whose transmission is implicit in the use of Internet communication protocols. However, these data are not collected for the specific purpose of identifying the data subject, even though, through processing and association with data held by third parties, they could allow users to be identified.

2.2 Data provided by the data subject

The Sites allow the user to send (voluntarily and explicitly) communications by writing an email to the address indicated on the Sites, or by calling the phone numbers indicated on the Sites from their device. This implies the subsequent acquisition of the contact data provided by the user, including their email address, and the consent to receive any response messages to their requests.

2.3 Personal Data

On the Sites, there are sections where the user can enter their personal data (Name; Surname; Tax Code) and their contact details (phone number; email) to subscribe to the services offered by the Data Controller. These data will also be processed.

2.4 Payment Data

On the Sites, it is possible to make payments to purchase the services offered by the Data Controller. Payment is made through services provided by third parties. Any data communicated by the third party to the Data Controller will be processed.

2.5 Cookies and tracking systems

For cookies, please refer to the specific "Cookie Policy".

2.6 Newsletter

On some pages of the Site, the Data Subject can give their specific consent to receive periodic updates from the Company and to subscribe to the newsletter mailing list. The Data Subject can, at any time, withdraw their consent to receive the Newsletter.

3. The legal basis for processing

The processing of personal data must be carried out on an appropriate legal basis identified by Article 6 of the GDPR to be valid.

Therefore, the Data Subjects are informed that the legal basis for the various data listed in the previous paragraph is as follows:

- a. for paragraph 2.1 "Browsing Data", the legitimate interest of the Data Controller (art. 6 lett. f GDPR);
- b. for paragraphs: 2.2 "Data provided by the data subject"; 2.3 "Personal Data"; 2.4 "Payment Data" and 2.6 "Newsletter", the provision of services or the execution of pre-contractual and/or contractual measures requested by the Data Subject (art. 6 lett. b GDPR);
- c. for paragraph 2.5 "Cookies and tracking systems", the legitimate interest for technical cookies and the consent (art. 6 lett. a) for any profiling cookies (see section II).

4. The purposes of processing

The Data Controller informs that the collection of personal data respects the principle of minimization, meaning that only data necessary to pursue the purposes of the processing are processed.

Therefore, the data collected will be used for the following purposes:

- a. for the data referred to in paragraph 2.1 "Browsing Data", these are collected and used to make the Sites usable and secure;
- b. for the data referred to in paragraphs: 2.2 "Data provided by the data subject"; 2.3 "Personal Data"; 2.4 "Payment Data" and 2.6 "Newsletter", they are collected and used to meet or respond to the requests sent by the data subject and to enable them to use the services provided by the Data Controller through the Sites;
- c. for the data referred to in paragraph 2.5, Cookies and other tracking systems, they are collected and used to make the Sites usable and functional for technical cookies and to improve and optimize them for profiling cookies;
- d. the Data Controller may process the contact details of the email addresses provided by the Data Subject for marketing purposes and to send newsletters, with the express consent of the Data Subject;
- e. the processing may also be carried out by the Data Controller to enable its right to defense in court.

5. The estimated period for data retention

The Company will retain the data subject to processing within the following terms:

- a. as for the "Browsing Data" of paragraph 2.1, for the entire duration of the navigation on the Sites. The data could be used to ascertain responsibility in case of hypothetical IT crimes against the site. In this last case, the retention respects the terms provided by law;
- b. while, the data referred to in paragraphs 2.2 "Data provided by the data subject"; 2.3 "Personal Data"; 2.4 "Payment Data" and 2.6 "Newsletter" are retained for the period necessary to fulfill the request and according to what is allowed by the current legislation (and in any case for a period not exceeding 10 years);
- c. finally, the data related to cookies and other tracking systems of paragraph 2.5 are retained for the period indicated in section II ("Cookie Policy").

6. The rights of the Data Subject

The Data Controller informs that each Data Subject can exercise their rights under the GDPR at any time.

Specifically, the Data Subject, at any time, has the right to:

- a. obtain information on what data is processed by the Data Controller (right of information);
- b. request and obtain, in an intelligible form, the data subject to processing concerning them, unless the sending of the copies of the processing may harm another right (right of access);
- c. obtain the correction of the personal data provided if they are inaccurate or their integration if they are incomplete (right of rectification and updating);
- d. obtain the deletion of the data in possession of the Data Controller in the forms and limits imposed by Article 17 GDPR (right to be forgotten);
- e. obtain a restriction on the processing carried out in the cases provided by Article 18 GDPR;
- f. receive from the Data Controller, in an intelligible form, the personal data concerning them, as well as the right to transmit such data to a different data controller (right to portability);
- g. object, at any time, to the processing of personal data concerning them. In this case, the Data Controller will refrain from further processing the personal data unless the cases provided by Article 21 GDPR;
- h. file a complaint with the supervisory authority, the Data Protection Authority (www.garanteprivacy.it), as provided by Article 77 GDPR, or to act before the ordinary judicial authority, Article 79 GDPR, if they believe that the processing of personal data carried out by the Data Controller violates the provisions of the GDPR.

The Data Controller also informs that the Data Subject has the right to revoke, at any time, the consent given for the processing of data. The revocation will only operate for the future and will not affect the processing carried out based on the consent previously given.

The exercise of the above rights can be exercised by communication to the Data Controller (whose contact details are indicated in paragraph 1 of this section).

7. The recipients of the data

The personal data collected are processed by the staff of the Data Controller, who acts based on specific instructions regarding the purposes and methods of the processing itself.

Furthermore, the data may be communicated to:

- all those subjects (including Public Authorities) who have access to personal data by virtue of legal or administrative provisions;
- companies, consultants, or professionals who may be entrusted with the installation, maintenance, updating, and, in general, the management of the hardware and software of the Company or which the Company uses for the provision of its services;
- all those public and/or private subjects, natural and/or legal persons,

where the communication is necessary or functional to the correct fulfillment of the obligations deriving from the law.

SECTION II – COOKIE POLICY

1. The definition of "Cookie"

Cookies are information stored on the browser of a computing device (PC, tablet, smartphone) during a browsing session on the Sites.

Each cookie contains different data (e.g., the name of the server it comes from, a numerical identifier, etc.).

Cookies can remain in the system for the duration of a session (i.e., until the browser used for web browsing is closed) or for long periods and may contain a unique identifier code.

2. The function of cookies

Cookies are distinguished by their functionality:

- a. Technical cookies: which are used to perform computer authentications, session monitoring, and storage of specific information about users who access a web page. Their function is to make browsing and use of the Sites faster and easier;
- b. Profiling cookies: these cookies can instead be used to monitor and profile users during navigation to send targeted and personalized advertising of services;
- c. Third-party cookies: the Sites may contain cookies from other sites and content in various elements hosted on the page itself, usually used for profiling purposes.

3. The notice to the Data Subject

The Data Controller stores, for a period not exceeding 12 months, any consent given by the Data Subject.

The Data Subject is informed both by the brief notice (banner displayed until consent is given or denied, as explained in the paragraph "How to disable cookies?") and by this extended notice.

4. The cookies used on the Site

Technical cookies (first party)

- improve the functioning and display of the Sites;
- store the user's consent to the use of cookies.

Analytical cookies (third party):

- functional for aggregated analysis of visits to the site through the use of a third-party service.

Profiling cookies (third party):

- create user profiles;
- serve to send advertising messages in line with the preferences expressed by the same during web browsing through the use of a third-party service;

- are not retained for more than 12 months.

Functional cookies (third party):

- allow the site to recognize you every time you access the site so you don't have to enter your access data every time you visit the Sites.

- If you placed an order and closed the session without completing it and without deleting it, these cookies allow you to complete the operation on the new access.

Cookies used on the Site

First-party cookies: exclusively technical cookies are used, for session management (duration: session), and to store the user's consent to the use of cookies (duration: 12 months).

Third-party cookies: cookies provided by the following third parties are used on the Sites along with links to their respective privacy policies (also for disabling them).

Analytical cookies

Google Analytics:

<https://policies.google.com/privacy?hl=it+e+https://tools.google.com/dlpage/gaoptout#infodelete> (For the deletion and disabling of cookies)

Profiling cookies

Google:

to find out how Google uses cookies: <https://policies.google.com/technologies/cookies>

to discover Google's privacy policy: <https://policies.google.com/privacy>

to disable profiling: <http://www.google.com/settings/ads>

Functional cookies

PayPal:

for PayPal's cookie policy: <https://www.paypal.com/IT/webapps/mpp/ua/cookie-full>

to disable PayPal cookies

https://www.paypal.com/myaccount/privacy/cookiePrefs?locale=it_IT

5. How to disable cookies?

Control via browser: Commonly used browsers (e.g., Internet Explorer, Firefox, Chrome, Safari) accept cookies by default, but this setting can be changed by the user at any time. This applies to both PCs and mobile devices such as tablets and smartphones: it is a generally and widely supported function. Therefore, cookies can easily be disabled or disabled by accessing the options or preferences of the browser used, and generally, third-party cookies can also be blocked; in general, such options will only have an effect on that browser and on that device, unless options are active to unify preferences across different devices. However, the disabling of technical cookies may affect the full and/or correct functioning of various sites, including this Site.

Third-party cookies: third-party cookies can be disabled either as described above or by referring to each third party (following the links indicated in the previous paragraph).

Online tools: it is noted that from the site <http://www.youronlinechoices.com/it>, it is possible to not only acquire further information about cookies but also verify the installation of numerous cookies on your browser/device and, where supported, disable them.