



PIRELLI DEUTSCHLAND GmbH

PIRELLI DEUTSCHLAND GmbH  
Höchster Straße 48 – 60  
64747 Breuberg, Germany.

## PRIVACY POLICY – PURCHASE OF P ZERO™ EXPERIENCE PACKAGES

This Privacy Policy was last updated in 8 March 2021.

### 1. LEGAL INFORMATION

**1.1** The privacy of your Personal Data is of the utmost importance to us. This privacy policy (hereinafter, the “**Privacy Policy**”) has been created to help you understand how we process the information that we collect on you and any accompanying persons within the scope of the sale of P ZERO™ Experience packages by PIRELLI (as defined in art. 1.2 below and described more fully in the General Conditions of Sale).

**1.2** Pirelli Deutschland GmbH, Höchster Straße 48-60, 64747 Breuberg i.Odw. (hereinafter referred to as “Pirelli”, “we”, “us” or “our”, as appropriate) will act as the “Controller” of Personal Data provided for the purposes of participation in the P ZERO™ Experience, for the purposes detailed in Section 3.

### 2. COLLECTION OF INFORMATION

**2.1** We collect personal data, which under applicable data protection legislation, in particular Regulation EU 679/2016 of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (also referred to as the “**GDPR**”), includes information that can be used to identify you, including - but not limited to - your first and last name, street address, ZIP/postal code, city, country, state, phone number, email (hereinafter as “**Personal Data**”).

#### Information you provide to us

**2.2** We can process your name, date of birth, contact details, email address, domicile address, the name and date of birth of any accompanying persons and any other information you provide us with when you interact with us or when you contact us.

## Technical Information

**2.3** When you browse our website, we may collect information that identifies your computer and its browser program or a mobile device that you use to surf the internet. This is done by means of small text files called cookies and other similar IT technology (all of which are grouped under the term "Cookies" in this document). Among their features, the previously saved cookies allow us to recognise your browser when you visit the website again. Cookies may store unique identifiers, user preferences and other information as specified in our Cookie Policy.

**2.4** For further information on the cookies we use, please refer to our Cookie Policy, which you can view [here](#).

## 3. USE OF PERSONAL DATA

3.1 We may use your Personal Data for the following purposes:

- (i) for your registration on the website dedicated to the P ZERO™ Experience;
- (ii) to enable you to purchase a P ZERO™ Experience Package and for the requirements relating to the organisation and management of the P ZERO™ Experience;
- (iii) to respond to your requests for assistance addressed to **Customer Care**;

The processing of your Personal Data for the purposes of this Section 3 is necessary to fulfil your request to participate in the P ZERO Experience and therefore it does not require your prior consent.

3.2 Pirelli may also use your Personal Data for marketing purposes, as described under Section 7 below, and subject to your prior consent.

## 4. SHARING OF PERSONAL DATA

4.1 We may disclose your personal data if permitted by law or as set out below:

- (a) Payment services provider. So that you can make online payments via credit card, the Personal Data you have provided will be processed by a payment services provider identified by PIRELLI, which will act as an independent Data Controller, in compliance with its own privacy policy, within the scope of a protected website managed by the same company.
- (b) Pirelli Group companies. Your Personal Data may be shared with Pirelli & C. S.p.A. and/or with other Pirelli Group companies incorporated in Europe, to pursue legitimate

interests related to the performance of technical and organizational activities functional to the purposes described in Section 3.

(c) Third Parties. Your Personal Data may also be processed by service providers and/or insurance companies appointed by Pirelli. The insurance companies will act as independent Personal Data Controllers. The other third parties will act, unless otherwise specified, as Data Processors. We wish to specify that the third parties are subject to confidentiality agreements with us and other legal restrictions that prohibit their use of the information we provide them for any purpose other than to perform the related outsourcing activity, unless you have explicitly agreed or given your prior permission to them for additional uses.

(d) As permitted or required by law. In certain cases, we may be required to provide Personal Data in response to a valid court order, subpoena, government investigation, or as otherwise required by law. We also reserve the right to report to law enforcement agencies any activities that we, in good faith, believe to be unlawful or in violation of applicable laws. We may release certain Personal Data when we believe that such release is reasonably necessary to protect the rights, property, and safety of others and ourselves, or to detect, prevent, or otherwise address fraud, security, or technical issues.

(e) Business transaction. In the event that we intend to sell or transfer ownership or control of any or all of our business, operations or services to a third party, we may need to disclose your Personal Data to a potential buyer both before and after the purchase. We will do so in accordance and in compliance with the data protection laws applicable to you. In any case, in the event the sale goes through, we will require that the receiving party agree that they will be similarly bound by the provisions of this Privacy Policy and that they will only use and disclose your Personal Data as we are similarly entitled under this Privacy Policy. In the event the sale does not go through, we will require the potential purchaser to not use or disclose your Personal Data in any manner whatsoever and to completely erase the same.

## **5. The privacy RIGHTS of participants of the P ZERO™ Experience**

**5.1** Participants of the P ZERO™ Experience have several privacy rights in accordance with current personal data protection laws. According to GDPR provisions you have the right to access to your data processed by us, correct it, delete it, limit/restrict the processing of your data that can be performed by us, and you have the right to your Personal Data portability and the right to be notified about any possible data breaches of the safety of your Personal Data that may put at risk your rights to confidentiality and personal data protection. In order to exercise your rights you can contact us at [privacy.dept.de@pirelli.com](mailto:privacy.dept.de@pirelli.com). You can also lodge a complaint with the authority competent in your country, in accordance with applicable data protection laws. We may not be able to accommodate every request related

to certain information if we believe this would violate any law or other legal requirement, or other data subjects' rights.

## **6. STORAGE OF PERSONAL DATA**

**6.1** We will retain the Personal Data of participants of the P ZERO™ Experience (i) for as long as your account is active (if applicable and limited to your Personal Data); (ii) for a period of 1 (one) year after our last communication made for purposes linked to the supply of the P ZERO™ Experience package, except where it is necessary to retain it for longer periods due to mandatory provisions of law; (iii) for marketing purposes, for a period of 2 (two) years after the last communication from Pirelli, unless otherwise requested by you (in this case, limited to the Personal Data of participants who have provided marketing consent). We will also retain the Personal Data of participants of the P ZERO™ Experience, if necessary, to comply with our legal obligations, resolve disputes, and enforce our rights (for defensive purposes). We will delete Personal Data upon the request of the data subject, where the circumstances warrant, in accordance with applicable data protection laws.

## **7. ELECTRONIC MARKETING COMMUNICATIONS**

**7.1** When you opt-in to receive direct marketing emails or communications, you consent to Pirelli to send you any promotional emails (including newsletters) and other commercial electronic communications concerning products and/or services of Pirelli or of other Pirelli Group Companies. You can always limit the communications that Pirelli sends to you. To refuse future commercial emails, simply click the link labelled “unsubscribe” at the bottom of any email Pirelli sends you.

**7.2** Bear in mind that even if you have decided not to receive promotional emails in the future, it might still be necessary for us to contact you regarding important information about your account, in accordance with applicable data protection laws. Should you require information or assistance on how to unsubscribe, contact us by email at the following address: [privacy.dept.de@pirelli.com](mailto:privacy.dept.de@pirelli.com)

## **8. WHERE WE STORE THE PERSONAL DATA of participants of the P ZERO™ EXPERIENCE**

**8.1** Pirelli will process the Personal Data of participants of the P ZERO™ Experience within the European Union.

## 9. PRIVACY POLICIES OF THIRD PARTIES

**9.1** These Privacy Policy provisions only apply to the use and disclosure of information by Pirelli. We are not responsible for other websites or applications. These have their own rules for data protection, data collection, use and disclosure practices. We ask that you familiarise yourself with the privacy policies of all third parties before you pass on your information to them.

## 10. RESTRICTIONS ON MINORS' DATA

**10.1** If you are a minor, please do not attempt to register on this website or provide personal information about yourself without the appropriate consent of your legal guardian. If we learn that the personal data of a minor has been collected without the consent of the legal guardian, we will delete this information immediately. If you believe that we have collected personal data from a minor, please contact us at [privacy.dept.de@pirelli.com](mailto:privacy.dept.de@pirelli.com).

## 11. SECURITY OF PERSONAL DATA

**11.1** We have taken security measures to protect your personal data from unauthorised access, unauthorised use or publication, unauthorised modification and unlawful deletion, and accidental loss. We only allow access to our databases if it is necessary and then only under strict conditions with regard to the type of use.

**11.2** It is your responsibility to protect the security of your login information, and we recommend that you use a unique password for our website that is different from the password you may use on any other site.

## 12. AMENDMENTS TO THE PRIVACY POLICY

**12.1** Our Privacy Policy may change from time to time. We will not restrict your rights under this Privacy Policy without your express consent. We will notify you of any changes to the Privacy Policy on the website, and if the changes are significant, we will provide you with an even more explicit indication. The date the Privacy Policy was last revised is shown at the top of the page.

## 13. HOW TO CONTACT US

**13.1** If you have any questions or concerns in connection with this Privacy Policy, or if you wish to review and process your personal data, or if you want us to delete the personal data stored in our actively used databases, please contact: [privacy.dept.de@pirelli.com](mailto:privacy.dept.de@pirelli.com).

You can also contact the Data Protection Officer ("Data Protection Officer") at the registered office of the company by sending an email to [DPO.Germany@pirelli.com](mailto:DPO.Germany@pirelli.com).