



PRIVACY POLICY – P ZERO EXPERIENCE - ON LINE SALES - UNITED STATES

1. LEGAL INFORMATION

This Privacy Policy was last updated on April 6, 2021.

- 1.1 The privacy of your Personal Data (defined below) is of the utmost importance to us. This privacy policy (the “**Privacy Policy**”) covers and is designed to help you understand how we process information that we collect about you, that you provide to us online or that we collect when you interact with us through the website <https://pzeroexperience.pirelli.com/en-ww/circuits/thermalclub> (the “**Website**”).
- 1.2 The Privacy Policy is provided on behalf of Pirelli Tire LLC, with address at 100 Pirelli Drive SE, Rome, Georgia (hereinafter referred to as “**Pirelli**”, “**we**”, “**us**” or “**our**”, as appropriate) and all related companies (hereinafter referred to as the “**Pirelli Group**”). We or one of our related companies will act as “**Controller**” of your Personal Data for the purposes detailed herein.
- 1.3 We have created this Privacy Policy to describe and explain our data collection practices and your data protection rights. While this Privacy Policy was designed to address data privacy requirements that may be applicable to you, some parts of this Privacy Policy may apply to residents of certain jurisdictions only. Visitors to our site and the Website should read this Privacy Policy in its entirety.

2. COLLECTION OF INFORMATION

- 2.1 We collect personal data, which under applicable data protection legislation, including but not limited to the California Consumer Privacy Act (“**CCPA**”) and 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**”) and prevailing data privacy laws in various jurisdictions throughout the United States, 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 and email address (hereinafter as “**Personal Data**”). For additional information on how this Privacy Policy is supplemented by CCPA and GDPR for individuals who have rights under such laws, refer to Sections 14 and 15, respectively.

Information you provide to us

- 2.2. You may be requested to provide to us certain Personal Data about you when you make an inquiry through our Website, when you complete and submit the forms published on our Website, when you communicate with us, and/or when you interact with us during certain events, for purposes detailed in Section 3. Personal Data you will provide to us may include your name, date and place of birth, e-mail address, and any other information you provide when interact with us or when you contact us.
- 2.3 We may collect your name, contact information, e-mail address, home address, credit card information and any other information you provide when interact with us, make an inquiry through our Website, or submit any registration form, or when you contact us.

Technical information



2.4 When you browse our Website, we may collect information which can be used to identify your computer and its browser program or any mobile devices that you use to surf the internet. It is collected by installing small text files called “Cookies” and other, similar information technology techniques (which are comprehensively referred to in this document as “**Cookies**”). In addition to other functions, when you visit our website(s) again, the Cookies previously stored allow us to recognize your browser. Cookies may store unique identifiers, user preferences, or other information as described in our Cookie Policy.

2.5 For any other information on the Cookies we use, please refer to our Cookie Policy.

3. **USE OF PERSONAL DATA**

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

(i) to allow your registration to our Website;

(ii) to respond to your requests of assistance;

(iii) to sell you the P ZERO™ Experience Package and managing the organization of the event. For this specific purpose, your Personal Data will be processed by Pirelli Tire LLC as autonomous Controller.

(a) We are able to process your Personal Data for purposes of this Section 3 because: You have consented to its doing so;

(b) Collecting and using your personal information is necessary to fulfil legitimate business interests, which may include (i) fulfilling contractual obligations or otherwise performing services for you; or (ii) investigating, defending against, or prosecuting any actual, threatened, or potential claim in a court of law or other judicial or regulatory forum or otherwise protecting your legal rights; and/or

(c) It is necessary to comply with any applicable regulatory, judicial, or other legal obligation, or to fulfil your request, 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.

3.3 The provision of your Personal Data is voluntary but necessary for purposes of this Section 3; in the event you do not provide us your Personal Data, it will be impossible for us to carry out such activities.

3.4 **ADDITIONAL USES of DATA FOR US USERS ONLY**

For users of the Website in the United States only, and subject to your prior consent, we may process Personal Data to market products to you in such a way that does not disclose your Personal Data to unaffiliated third parties or perform various profiling activities using Personal Data.

4. **SHARING OF PERSONAL DATA**

4.1 We may share your Personal Data when authorized by law or as follows:



- (a) 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.
- (b) Payments by credit card. In order to allow you to pay for the Products by credit card, your Personal Data will be processed by N&TS GROUP Networks & Transactional Systems Group S.p.A., which shall act as autonomous personal data controller, by means of a protected website managed by such company, which adopts technological systems consistent with best industry practices with respect to levels of reliability, security, protection and confidentiality for information transmitted over the internet.
- (c) Third Parties (Service Providers, Suppliers). Your Personal Data may also be processed by service providers, including authorized dealers that we might use to facilitate or outsource one or more aspects of the operation of our Website or our business or Pirelli business partners. These 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 specific related operation, unless you have explicitly agreed or given your prior permission to them for additional uses. These parties will act, unless otherwise specified, as Personal Data Processors.
- (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 to do 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. YOUR PRIVACY RIGHTS

5.1 You may have certain privacy rights in accordance applicable local data protection laws. You may have the right to access your data processed by us, correct it, delete it, and limit/restrict the processing of your data by us; and you may have the right to your Personal Data portability and the right to be notified about any possible data breaches involving your Personal Data that may put at risk your rights to confidentiality and data protection. In order to exercise your rights you can contact us at privacy.nafta@pirelli.com. You can also lodge a complaint with the authority competent in your jurisdiction, 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. RETENTION OF PERSONAL DATA

6.1 We will retain your Personal Data for: (i) as long as your account is active; (ii) for the period mandatorily required by the applicable laws in relation to Personal Data processed for the sale of the services requested; (iii) for a period of 1 (one) year from our last contact, in case you have requested information and/or assistance only; (iv) for marketing purposes, for a period of 2 (two) years from the end of last communication from Pirelli, unless otherwise requested by you. We will also retain your Personal Data as necessary to comply with our legal obligations, resolve disputes, and enforce our rights (i.e.: defensive purposes). We will delete your Personal Data upon your request, if permitted, in accordance with the data protection laws applicable to you.

7. COMMERCIAL ELECTRONIC COMMUNICATIONS

7.1 When you opt-in to receive direct marketing emails or communications, you consent to Pirelli or its agents sending you any promotional emails (including newsletters) and other commercial electronic communications concerning products and/or services of Pirelli or of other Pirelli Group companies. Pirelli may include web beacons such as Internet tags or pixel tags in promotional emails in order to determine whether such communications have been opened. You can always limit the communications that Pirelli sends to you. To refuse future promotional emails, simply click the link labelled "unsubscribe" at the bottom of any email Pirelli sends you.

8. WHERE WE STORE YOUR PERSONAL DATA

8.1 Pirelli will store your Personal Data on its IT systems based in the European Union.

9. PRIVACY POLICIES OF THIRD PARTIES

9.1 This Privacy Policy only addresses the use and disclosure of information by Pirelli. We are not responsible for the privacy policies of other websites or applications and encourage you to read all applicable terms, conditions and privacy policies provided by all third parties prior to providing them with your information.

10. LIMITATIONS TO MINORS' PERSONAL DATA

10.1 Minors are not permitted to use the Website and may not provide us any Personal Data about themselves without the provision of adequate consent by the holder of parental responsibility over them. If we learn that we have collected Personal Data from a minor, without the holder of parental responsibility's consent, we will promptly delete that information. If you believe we have collected Personal Data from a minor, please contact us at privacy.nafta@pirelli.com. Pirelli cannot collect, and under no circumstance shall any person provide, Personal Data about a person under the age of 13 years old.

11. SECURITY OF PERSONAL DATA

11.1 We use a variety of physical, technical, and administrative security measures to protect your Personal Data from unauthorized access, improper use or disclosure, unauthorized modification, and unlawful



destruction and accidental loss. In the event that we are required to provide access to Personal Data by a third party, we require such third parties to protect your information in accordance with our information security policies that align with generally accepted information security standards. It is important to keep in mind, however, that no security measures are absolutely effective. The transmission of information via the Internet is not completely secure. Although we will use all reasonable measures to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted to us, therefore, any transmission is at your own risk.

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 anywhere else.

12. CHANGE OF PRIVACY POLICY

12.1 Privacy laws and practice are constantly developing. Our policies and procedures are therefore under continual review. Our Privacy Policy may change from time to time but we will not reduce your rights under this Privacy Policy without your explicit consent. The date the Privacy Policy was last revised is identified at the top of the page.

13. HOW TO CONTACT US

13.1 If you have questions or concerns regarding this Privacy Policy, or if you wish to review, edit your Personal Data or request that we delete Personal Data stored in the databases we actively use, please contact: privacy.nafta@pirelli.com.

14. SPECIFIC INFORMATION FOR CALIFORNIA USERS

The California Consumer Privacy Act

14.1 The following information is provided for California residents pursuant to the California Consumer Privacy Act ("CCPA"). This information supplements the foregoing Privacy Policy for individuals who have rights pursuant to California law and shall not be construed as creating any right or duty that is not otherwise provided by law.

14.2 Pirelli may collect the following categories of personal information:

- (a) Identifiers and personal information: such as names and email addresses.
- (b) Protected characteristics: such as national origin.
- (c) Internet or other electronic network activity information: such as browser types and versions, device identifiers, network and/or service providers and operating systems and platforms.

We may collect the above categories of personal information directly from you, such as when you complete forms; indirectly from you, such as observing your actions on the App; and from publicly available sources.

We have not sold personal information about California residents in the past 12 months. We have collected, used and disclosed the above categories of personal information in the past 12 months for



business purposes, in a manner consistent with the collection, use and disclosure described for Personal Data in Sections 3-5 of this Privacy Policy.

14.3 California residents have the following rights, subject to certain exceptions as set forth in the CCPA:

- (a) *Right to Access:* California residents have the right to receive the specific pieces of personal information we have collected about them in the prior 12 months and to have this delivered, free of charge, either (a) by mail or (b) electronically in a portable and, to the extent feasible, readily useable format that allows the individual to transmit this information to another entity without hindrance.
- (b) *Right to Know:* California residents have the right to receive information from us regarding how we have handled personal information in the prior 12 months, including:
 - (i) The categories of personal information we collected
 - (ii) The categories of sources from which we collected the personal information
 - (iii) Our business or commercial purpose for collecting or selling personal information
 - (iv) The categories of third parties with whom we share personal information, if any
 - (v) The categories of any personal information we sold and the categories of third parties to whom the personal information was sold
 - (vi) The categories of personal information that we disclosed about you for a business purpose
- (c) *Right to Delete:* California residents have the right to request, at no charge, deletion of their personal information that we have collected about them and to have such personal information deleted, except where an exemption applies.
- (d) *Protection from Discrimination:* California residents have the right to be free from discrimination by us as a result of exercising their rights under the CCPA.

14.4 California residents who wish to exercise their rights to access, know, and/or delete their personal information may submit a request to privacy.dept@pirelli.com. We may require additional information from you in order to verify your request, as required by the CCPA.

California “Shine the Light” Law

14.5 California law permits its residents to request and receive information about a business’ disclosure of certain categories of personal information to other companies for their use in direct marketing. If you are a California resident and user of our website, products, App, or services, you can request a copy of this information from Pirelli by contacting us by any means provided in the “How to Contact Us” section. Such request must include your name and email address, and postal address for email requests, or your name and postal address in mail requests. Please include “California Data Privacy Request” in the subject line of your email to assist processing such request.

15. SPECIFIC INFORMATION FOR EUROPEAN UNION USERS

- 15.1 To the extent any European Union person possesses rights pursuant to the GDPR under this Privacy Policy, the following apply:
- (a) For Personal Data that we process in connection with any products or services we offer to you, we process such Personal Data (i) on the basis of consent, (ii) in order to take steps or provide a service at your request, or (iii) for our legitimate interests in providing our services to you or otherwise in supporting our business needs.
 - (b) You may have the following rights with respect to Personal Data we collect about you:
 - (i) Rectify any inaccurate Personal Data that we hold about you
 - (ii) Have your Personal Data erased under certain circumstances
 - (iii) Have the processing of your Personal Data restricted where you dispute its accuracy, if you think its processing is unlawful, if you otherwise object to its processing, or when we no longer need your Personal Data and you need it in relation to a legal claim
 - (iv) Have access to your Personal Data, and the right to receive copies of your Personal Data in a structured, commonly used and machine-readable format and transfer those copies to another data controller, under certain circumstances
 - (v) Complain to your national data protection regulator if you feel that any of your personal information is not being processed in accordance with the GDPR
- 15.2 In addition, we do not use Personal Data or profiling to make automated decisions that have legal or similarly significant effects on individuals without obtaining your explicit consent to do so in advance.
- 15.3 If you withdraw your consent, we will stop processing the relevant Personal Data except to the extent we have other grounds for processing under applicable laws. We will respond to your request within a reasonable timeframe. You may withdraw your consent at any time; however, we may not be able to provide or continue to provide products or services to you.
- 15.4 Nothing in this Section 15 shall be construed to provide any right to any person that does not have such right by virtue of applicable law.