

## **PRIVACY POLICY – PIRELLI WEBSITES (WITH NO PURCHASE OF PRODUCTS/SERVICES)**

### **1. LEGAL INFORMATION**

This Privacy Policy was last updated on 6 May 2019.

- 1.1** The privacy of your Personal Data 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 when you interact with us or that you provide to us through our website(s).
- 1.2** Pirelli Tyre S.p.A., with registered offices at Viale Piero e Alberto Pirelli 25, 20126 Milan, Italy, Fiscal Code, VAT and Milan Business Registry Enrolment n. 07211330159 (hereinafter referred to as “**Pirelli**”, “**we**”, “**us**” or “**our**”, as appropriate) will act as “**Controller**” of your Personal Data 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** You may be requested to provide to us certain Personal Data about you when you make an inquiry through our website(s), when you complete and submit the forms published on our website(s), 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.
- 2.2** We may collect your name, contact information, e-mail address, home address, and any other information you provide when interact with us, make an inquiry through our website, submit a tyre registration form, or when you contact us.

#### **Technical information**

- 2.3** When you browse our website(s), 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.

2.4 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(s);
- (ii) to respond to your requests of assistance;
- (iii) to provide you with the information which you have requested, by way of example about new products and/or services offered by Pirelli;
- (iv) to allow you to take part in certain activities, events, initiatives or contests.

The processing of your Personal Data for purposes of this Section 3. is necessary 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.

### 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) Third Parties (Service Providers, Suppliers). Should your Personal Data be provided for purposes of taking part in activities, events, initiatives or contests, your Personal Data may also be processed by service providers and/or insurance companies entrusted by Pirelli. 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. They will act, unless otherwise specified, as Personal Data Processors.
- (a) 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.
- (b) 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. YOUR PRIVACY RIGHTS**

**5.1** You have several privacy rights in accordance with the data protection laws applicable to you. 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@pirelli.com](mailto:privacy.dept@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. RETENTION OF PERSONAL DATA**

**6.1** We will retain your Personal Data for: (i) as long as your account is active (if applicable); (ii) for a period of 1 (one) year from our last contact, in case you have requested information and/or assistance only; (iii) for the period mandatorily requested by the European applicable laws with respect to Personal Data collected for purposes of specific activities, events, initiatives or contests; (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 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.

## **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 application 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** If you are a minor, please do not provide us any Personal Data about yourself without the provision of adequate consent by the holder of parental responsibility over you. 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.dept@pirelli.com](mailto:privacy.dept@pirelli.com).

## **11. SECURITY OF PERSONAL DATA**

- 11.1** We have security protocols in place to protect your Personal Data from unauthorised access, improper use or disclosure, unauthorised modification, and unlawful destruction and accidental loss. We only allow access to our databases when necessary, and then under strict guidelines as to what use may be made of such data.
- 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. 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.dept@pirelli.com](mailto:privacy.dept@pirelli.com).

You may also contact the Data Protection Officer ("DPO") of Pirelli Tyre S.p.A. at the Company's registered office, e-mail [DPO\\_Ptyre@pirelli.com](mailto:DPO_Ptyre@pirelli.com).