

PERSONAL DATA PROCESSING POLICY

pursuant to Articles 13–14 of EU Regulation 2016/679 (the GDPR)

This Privacy Notice describes in a clear and transparent manner how we process the personal data of users who browse this website or use the digital services available therein. It therefore applies to all data collection and management activities that occur when users access our pages, view informational sections, or interact with the tools made available on the site. This notice does not concern any information collected through other means and/or websites that may be reached via links on our portals, which are governed by their own specific privacy notices.

This Privacy Notice may be amended, supplemented, or updated periodically, including in light of changes in applicable legislation or measures issued by the Italian Data Protection Authority and/or the European Data Protection Board. Any changes or updates will be communicated to data subjects by updating the Privacy Notice link in the website footer and/or in other dedicated sections of the site. Users are therefore encouraged to review this Privacy Notice regularly in order to be aware of its most recent version and remain informed about how their personal data are processed.

1. Data Controllers

The Data Controller is **hu Holding S.p.A.** with its registered office at Via Generale C.A. dalla Chiesa, 13 – 50136 – Florence (FI), Tax Code and VAT ID: 07377040485, which can be contacted at the following email address: **privacy@humancompany.com**.

The Data Protection Officer (DPO) can be contacted at the following email address: **rpd@humancompany.com**.

2. Data Types

Below are the categories of personal data processed within the limits of the purposes set out in this Privacy Notice:

- **Personal data provided by the user**

During use of the website, users may voluntarily provide the following personal data necessary to access the available services and functionalities:

- **Personal and contact data**, such as first name, last name, date of birth, nationality, language, phone numbers, and e-mail address.
- **Details of bookings made**, such as booking date and reference number.

- **Purchase data**, i.e. information relating to purchases made by the user on the website, such as a list of bookings, dates, and amounts.
- **Payment data**, such as credit/debit card and/or ATM card number (limited to the data necessary to identify/trace the transaction, with partial masking of the number), including information relating to payment methods (type of card) and the relevant payment circuits used.
- **Demographic data and interests**, such as geographic origin, group composition, and preferred services/experiences/activities.

- **Browsing data**

By browsing the website, certain technical information relating to the hardware and software used by users may be collected automatically by the computer systems that allow the website to function. The transmission of this information is implicit in Internet communication protocols. It may include, for example, the user's IP address, the domain name of the device used, the identifier of the requested resources (URI), the browser type and version, the presence of plug-ins, the identifier of the mobile device (such as the IDFA or Android ID), and further parameters relating to the operating system and the computing environment.

- **Data collected using cookies**

The websites use technical cookies necessary for their operation and, only with the user's consent, profiling cookies or third-party cookies. Information on the types of cookies used, their purposes, retention times, and how to revoke or modify consent can be found in the [Cookie Policy](#), which can be consulted in full.

3. Purposes and Legal Bases of Processing

The personal data collected via the website is processed exclusively for the purposes described in this section, in compliance with the legal bases provided for by the GDPR.

- **Website browsing**

During simple navigation of the website pages, certain data are processed to ensure proper operation of the site, monitor traffic, detect any malfunctions, and prevent abuse or unlawful activities. These activities are essential to keep the platforms secure and to provide users with a stable and reliable service.

The legal basis for such processing is the legitimate interest of the Data Controller, pursuant to Article 6(1)(f) of the GDPR.

- **Management of requests**

Personal data collected when users use the contact details provided on the website to submit requests or complete the contact form are processed solely for the purpose of providing the requested information through an effective and complete response.

Such processing is necessary to address requests of a pre-contractual nature pursuant to Article 6(1)(b) of the GDPR, as well as to fulfil the legitimate interest of the Data Controller in properly managing incoming communications, as provided for by Article 6(1)(f) of the GDPR. The data provided by users will not be used for purposes other than those described unless the data subject has given prior explicit consent.

- **Aggregated statistical analysis**

The information collected through cookies and similar technologies may be processed in an aggregate and anonymous manner for the sole purpose of improving the quality of the service and providing statistics concerning the use of the website.

Within the scope of such activities, the Data Controller may also send to the data subject, by means of electronic mail, satisfaction questionnaires and customer satisfaction surveys relating to the services used, in order to collect feedback and improve the quality of the offering.

The legal basis for the processing is the legitimate interest of the Data Controller in improving its services and carrying out commercial research, as well as in assessing customer satisfaction (Article 6(1)(f) GDPR).

- **Online table booking service**

The personal data of the data subject collected at the time of booking will be processed by the Data Controller in order to allow users to book tables, make payments, and manage booking requests, as well as to send service-related communications concerning the reservation.

As part of the booking process, users may, on an optional, explicit, and voluntary basis, enter any special requests in the “notes” field relating to their stay. Users are invited not to provide special categories of personal data pursuant to Article 9 of the GDPR (for example: health-related information such as medical conditions, allergies or food intolerances; requests related to limited mobility or disability; membership in protected categories; data revealing racial or ethnic origin; religious beliefs related to dietary preferences or service needs, etc.). However, should users decide to provide such data, they will be processed exclusively for the purpose of handling the request and only insofar as strictly necessary for managing the booking.

The legal basis for the processing is the performance of pre-contractual and/or contractual measures (Article 6(1)(b) GDPR) and, with regard to any special categories of data as described above, the explicit consent of the data subject (Article 9(2)(a) GDPR).

The provision of data is mandatory, as it is necessary to process booking requests; failure to provide such data may result in the inability to fulfil the booking request.

- **Registration, booking and participation in experiences and events**

The user's contact details and, where payment is required, payment data may be processed in order to allow the user to register and/or make reservations, including through third-party platforms, and to participate in experiences at the facilities and in other events organised by the Data Controller.

As part of the booking process, the user may, on an optional, explicit and voluntary basis, enter any special requests in the "notes" field. The Data Controller invites users not to provide special categories of personal data pursuant to Article 9 of the GDPR (for example: health-related information, such as medical conditions, allergies or food intolerances; requests related to reduced mobility or disability; membership in protected categories; data capable of revealing racial or ethnic origin; religious beliefs related to dietary preferences or service requirements, etc.). However, should the user choose to provide such data, they will be processed exclusively in order to fulfil the request and only insofar as strictly necessary for the management of the booking.

The legal basis for the processing is the performance of pre-contractual and/or contractual measures (Article 6(1)(b) GDPR) and, with regard to any special categories of data referred to above, the consent of the data subject (Article 9(2)(a) GDPR). The provision of data is mandatory, as it is necessary for registration and participation in experiences and/or events; failure to provide such data may result in the inability to participate in these initiatives.

- **Sending informational and promotional communications by e-mail relating to products/services already purchased (so-called "soft spam")**

The data subject's contact details (e-mail address) may be processed by the Data Controller in order to ensure that the data subject receives communications relating to services and products similar to those already purchased, pursuant to Article 130(4) of Italian Legislative Decree No. 196/2003.

This provision allows the Data Controller to carry out such processing without the data subject's consent, without prejudice to the data subject's right to object to the processing at any time. To this end, the data subject may request not to receive further such communications by clicking on the unsubscribe link included in each communication sent.

Such request shall not affect the sending of any communications for marketing purposes to which the data subject has expressly consented.

- **Profiling activities**

Subject to the data subject's specific and explicit consent, the data provided by the user may be used by the Data Controller to offer personalised products and/or services in line with the user's preferences, interests and/or behaviour, and to send personalised commercial communications.

The legal basis for such processing is the consent of the data subject (Article 6(1)(a) GDPR). Any consent given may be freely withdrawn at any time, without affecting the lawfulness of the processing carried out prior to such withdrawal. The withdrawal of consent may be communicated in accordance with the procedures described in Section 9 "Data Subject Rights" of this Privacy Notice.

- **Marketing activities**

Subject to the data subject's specific and explicit consent, personal data may be processed by the Data Controller for the purposes of sending advertising, promotional and/or direct sales material, carrying out market research or other forms of commercial communication (including personalised communications where the user has also consented to profiling).

The legal basis for such processing is the consent of the data subject (Article 6(1)(a) GDPR). Any consent given may be freely withdrawn at any time, without affecting the lawfulness of the processing carried out prior to such withdrawal. The withdrawal of consent may be communicated in accordance with the procedures described in Section 9 "Data Subject Rights" of this Privacy Notice.

Should the user not provide consent for profiling purposes, as set out above, marketing communications may still be sent in a segmented manner only (for example, based on territory, where the user has indicated a reference facility, or based on the chosen language, including through the indication of nationality), without making predictions or drawing conclusions about personal aspects such as purchasing preferences, interests, tastes and habits, or online behaviour.

- **Institutional / service communications**

The user's contact details will be processed for institutional or service-related communication purposes, such as notifying updates to contractual terms, websites or privacy notices.

The legal basis is the performance of pre-contractual and/or contractual measures pursuant to Article 6(1)(b) of the GDPR.

- **Purposes relating to the protection of rights, including those of the data subject**

Personal data will be processed by the Data Controller in order to protect its own rights, including in relation to any claims, or to take legal action, including by asserting claims against the data subject or third parties, as well as to demonstrate that responses have been provided to any requests for the exercise of one or more data subject rights.

The legal basis for such processing is the legitimate interest of the Company in protecting its rights (Article 6(1)(f) GDPR).

- **Compliance with legally binding requests and legal obligations**

The data subject's personal data may be processed in order to comply with legal obligations and/or measures or requests from competent authorities, including supervisory authorities.

In this case, the legal basis is compliance with legal obligations to which the Company is subject (Article 6(1)(c) GDPR).

4. Data Retention Period

Personal data are retained for different periods of time depending on the specific purpose for which they were collected. The retention period is determined in compliance with the principles of storage limitation and data minimisation set out in the GDPR, and personal data are erased or anonymised once the purposes for which they were processed have been fulfilled.

Below are the data retention periods in relation to the various purposes outlined above:

- **Website browsing:** browsing data are retained for a maximum period of 30 days, unless longer retention periods are required for reasons related to system security or for the investigation of potential cybercrimes.
- **Aggregated analysis and improvement of products/services:** data processed for this purpose are processed exclusively in aggregated and anonymised form.
- **Management of requests:** data collected when users contact the Company through the available channels are retained for the time strictly necessary to manage and respond to the user's request, after which they are erased or anonymised.
- **Table booking service:** data processed for these purposes shall be retained for a period not exceeding 10 years from the date of the booking.
- **Registration, booking and participation in experiences and events:** data processed for this purpose shall be retained for a period not exceeding 10 years from the date on which the experience and/or event takes place or, in any case, from the date of use of the service.

- **Sending informational and promotional communications by e-mail relating to products/services already purchased (so-called soft spam):** data processed for this purpose shall be retained for a period not exceeding two years from the date of purchase or check-out by the data subject, without prejudice to cases in which such processing is also necessary for other purposes.
- **Profiling activities:** data processed for profiling purposes shall be retained for a period not exceeding 12 months from the date of their registration, without prejudice to the right to withdraw consent and the right to object.
- **Marketing activities:** data processed for marketing purposes shall be retained for a period not exceeding 24 months from the date of their registration, without prejudice to the right to withdraw consent and the right to object.
- **Institutional / service communications:** data processed for this purpose shall be retained for a period not exceeding one year from the sending of each individual communication, without prejudice to cases in which such data are also necessary for other purposes described in this Privacy Notice, and without prejudice to the right to object.
- **Purposes relating to the protection of rights, including those of the data subject:** data processed for this purpose shall be retained for the entire duration of the relevant proceedings and, in any case, for the period deemed reasonably necessary by the Company to protect its rights, including in relation to applicable limitation periods.
- **Compliance with legally binding requests and legal obligations:** data processed for this purpose shall be retained for the entire duration of the proceedings before the relevant competent authorities, in addition to the applicable statutory limitation periods.

5. Processing Methods and Security Measures

Personal data are processed using IT and/or telematic tools, with organisational methods and logic strictly related to the purposes indicated, in full compliance with the principles of lawfulness, fairness, transparency, data minimisation, integrity, confidentiality and security set out in the GDPR.

Processing operations are carried out using methods suitable to ensure the protection of data at every stage, from collection to storage and, where applicable, erasure. The Data Controller adopts appropriate security measures to prevent unauthorised access, disclosure, alteration or destruction of personal data.

6. Data Disclosure

Access to personal data is granted only to subjects duly authorised and instructed by the Company. In particular, for the performance of certain processing activities, the Data Controller may disclose personal data to the following categories of external recipients, who will process such data, depending on their role, either as independent data

controllers or as data processors pursuant to Article 28 of the GDPR, and only to the extent strictly necessary to achieve the purposes described in this Privacy Notice:

- other companies belonging to the Human Company Group;
- external consultants and service providers supporting the above-mentioned activities, such as cloud service providers, IT or hosting providers, postal couriers, and communication agencies;
- professional firms, particularly where necessary for the protection of the Company's rights;
- banks and credit institutions, insurance companies;
- third-party companies, partners of Human Company, including those involved in the promotion of products and/or the provision of services. Payment and transaction management may also be carried out using services provided by third-party providers such as **Stripe Payments Europe, Ltd** (C/O A&L Goodbody, IFSC, North Wall Quay, Dublin 1). For further information regarding data processing carried out by Stripe as an independent data controller, users may consult its privacy policy available at: <https://stripe.com/en-it/privacy>. The management of event booking services is entrusted to **OBD SRL** (Via Romolo Gessi 48, 20146 – VAT and Tax Code: 12830740960);
- companies entrusted with sending commercial and/or promotional communications within marketing campaigns;
- entities that may access personal data pursuant to legal provisions, regulations or EU legislation, within the limits set forth by such rules.

An updated list of data recipients is available upon request by contacting the Data Controller at the indicated e-mail address. In any case, personal data will never be disclosed to third parties for marketing purposes unrelated to those described in this Privacy Notice.

7. Data Transfers

The Data Controller does not transfer personal data to countries outside the European Economic Area (EEA). Should such transfers become necessary, data subjects will be informed in advance and appropriate safeguards will be adopted, which may include, depending on the circumstances, verification of the existence of adequacy decisions issued by the European Commission, execution of standard contractual clauses, and/or adoption of supplementary measures in accordance with EDPB Recommendation 01/2020.

8. Dissemination of Data

Personal data collected through the website are not publicly disclosed.

9. Data Subject Rights

Regulation (EU) 2016/679 (GDPR) grants data subjects specific rights. In particular, with regard to the processing of their personal data covered by this Privacy Notice, data subjects have the right to request the Data Controller:

- **access** to their personal data and confirmation as to whether such data are being processed, as well as further information pursuant to Article 15 GDPR;
- **rectification** of inaccurate or incomplete data (Article 16 GDPR);
- **erasure** of personal data where the conditions set out in Article 17 GDPR apply;
- **restriction of processing** in the cases provided for by Article 18 GDPR;
- **data portability**, i.e. to receive their personal data in a structured, commonly used and machine-readable format or to have such data transmitted to another data controller (Article 20 GDPR);

- **objection** to the processing of their personal data at any time, save where compelling legitimate grounds prevail (Article 21 GDPR).

To exercise these rights, data subjects may contact the Data Controller at any time by sending a request to the following e-mail address: **rpd@humancompany.com**.

For the purpose of ensuring proper handling of requests and data protection, the Company will verify the identity of the requester before proceeding. Following such verification, the Data Controller will respond within **30 days** of receipt of the request, unless an extension is required in accordance with applicable law.

Data subjects also have the right to lodge a complaint with the Italian Data Protection Authority should they believe that the processing of their personal data infringes applicable data protection laws. The Authority can be contacted at phone number +39 06 696771, by e-mail at **protocollo@gdp.it**, or by certified e-mail (PEC) at **protocollo@pec.gdp.it**.

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