

EXTRACT FROM JOINT CONTROLLERSHIP AGREEMENT

BETWEEN

Unieuro S.p.A. (“Unieuro”), with registered office in Palazzo Hercolani, Via Piero Maroncelli n. 10 - 47121 Forlì (FC)

AND

Monclick s.r.l. (“Monclick”), with registered office in Via Marghera n. 28 - 20149 Milano (MI),

each a “Party” together the “Parties”.

The Parties shall ensure that, in the context of their respective activities, they are aware and apply all the current data protection laws relevant for the proper management of their activities.

1. Preamble and Annexes

(Omitted)

2. Data processing activities covered by the Agreement

The processing activity covered by this Agreement is aimed at carrying out activities for the protection of corporate assets and physical security activities, identification and reception, as well as the performance of corporate events and related activities. The activities aimed at protecting the heritage and physical security and identification and reception will take place in Milan, via Marghera n. 28. The activities aimed at carrying out corporate events, on the contrary, can take place both at the headquarters in Milan and at the other locations of the Parties on the Italian territory.

The Parties reserve the right to identify in the course of operations additional procedures and precautions to ensure that processing operations are carried out in compliance with the general principles laid down in Article 5 of the Regulation and the internal law of the Member State where the processing activities are carried out, with particular reference to the principles of lawfulness, fairness and transparency towards data subjects, as well as the limitation of purposes, minimisation of data and accuracy of processing.

3. Object

By entering into this Agreement, pursuant to art. 26 of EU Regulation 2016/679, the Parties, with regard to the processing activities described in art. 2 above, determine the following:

- a) Informations to be provided to data subjects pursuant to art. 13 or 14 of EU Regulation 2016/679 and ex art. 4 paragraph 3 of L. 300/1970:** with reference to the activities described in points a. and b. of article 2 of this Agreement, Unieuro will provide data subjects with information regarding the processing of their personal data for all purposes and modalities related to the services covered by this Agreement, and the operation of video surveillance equipment and the possibility of carrying out inspections. With reference to the activities described in point c. of article 2 of this Agreement the Parties reserve the right, from time to time, depending on the peculiarities of the individual event, to identify the content, the modalities and the respective involvement for the administration to the data subjects of the information;
- b) Exercise of the right of the data subject ex artt. 15 ss. of the Regulation UE 2016/679 (collection and management of data subjects’ requests:** Unieuro acts as a contact point for data subject in order to manage their requests. In these cases, Unieuro undertakes to ascertain in advance the identity of the data subject in order to verify the legitimacy of the request and, where necessary, to inform Monclick promptly in order to ensure an adequate response within the time required by the Regulation. In any case, the data subject may exercise their rights against each of the two Parties, which are obliged to comply;
- c)** (Omitted);
- d)** (Omitted);

e) (Omitted);

f) (Omitted);

g) (Omitted);

h) Technical and organisational measures be taken ex art. 32 of the Regulation UE 2016/679: Each Party undertakes to ensure a level of security appropriate to the risk, taking into account, in particular, the risks that could arise from the specific processing covered by the Agreement, such as, for example, destruction or loss of data, including accidental loss, as well as unauthorized access or processing not allowed or not in accordance with the purposes of data collection.

i) Notification of any personal data breach to the Supervisory Authority and to the data subject: in cases where such obligations are due, pursuant to articles 33 and 34 of Regulation, and without prejudice to mutual cooperation, each Party shall provide independently;

j) (Omitted)

4. Termination of the Agreement

(Omitted)

5. Effective date and duration

(Omitted)

6. Amendments to the Agreement

(Omitted)