- Document classification: Public -

PRIVACY POLICY – CUSTOMERS

Information on the processing of personal data pursuant to and for the purposes of art. 13 of Regulation (EU) 2016/679 ("GDPR")

1. Kirey and Regulation (EU) 2016/679

Kirey and the Companies under its control and coordination, pursuant to and for the purposes of Article 2359 of the Italian Civil Code of the company Kirey S.r.l. (hereinafter "Kirey Group" or the "Companies"), for years has considered the protection of personal data to be of fundamental importance, ensuring that the related processing, carried out by any means, whether automated or manual, is carried out in full compliance with the protections and rights recognized by Regulation (EU) 2016/679 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 (hereinafter the "Regulation") and by the other applicable rules on the protection of personal data.

This privacy policy - the "policy" - applies to Kirey Group's Customers (hereinafter, "Data Subjects").

The Kirey Group companies that will jointly process Personal Data for the purposes referred to in paragraph 4 of this Policy below are the following:

- **Kirey S.r.l.** with registered office in Viale Francesco Restelli 5, 20124 - Milan, registered in the Milan Companies' Register, Tax Code and VAT Number 06729880960, R.E.A. 1910802;
- **Kubris S.r.l.** with registered office in Viale Francesco Restelli 5, 20124 - Milan, registered in the Milan Register of Companies, Tax Code and VAT Number 10084830966, R.E.A. 2503708;
- **Sibyl S.r.l.** with registered office in Viale Francesco Restelli 5, 20124 - Milan, registered in the Milan Register of Companies, Tax Code and VAT Number 06626020967, R.E.A. 2122766;
- **Kirey Advisory S.r.l.** with registered office in Viale Francesco Restelli 5, 20124 - Milan, registered in the Milan Register of Companies, Tax Code and VAT Number 13507320961, R.E.A. 2727430;
- **Kirey Forward S.r.l.** with registered office in Viale Francesco Restelli 5, 20124 – Milan, registered in the Milan Register of Companies, Tax Code and VAT Number 14410730965, R.E.A. 2781180.

The Companies, in order to ensure the correct management and execution of the joint ownership agreements, have identified the company Kirey S.r.l. as the subject to whom the processing activity indicated in this Policy is assigned. The aforementioned companies play the role of Joint Data Controllers, meaning these "two or more companies that jointly determine the purposes and means of processing" as provided for in Article 26 of the Regulation. With this in mind, the Companies have signed a specific agreement pursuant to Article 26 of the GDPR, the deletion of which may be presented to the data subjects upon their specific request.

The Companies can be contacted through the following channels:

- by writing to Kirey Group at Kirey S.r.l., Viale Francesco Restelli 5, 20124, Milan;
- by sending an e-mail to the privacy@kireygroup.com e-mail box.

2. Data Protection Officer (DPO) of Kirey Group

In order to facilitate relations between the Data Subject and each Data Controller, Kirey Group has decided to adopt and appoint the figure of the Data Protection Officer (DPO) as provided for by Articles 37-39 of the Regulation. The DPO can be contacted by sending a written communication to the e-mail address dpo@kireygroup.com and/or by writing to the Data Protection Officer of Kirey Group at Kirey S.r.l., Viale Francesco Restelli 5, Milan (hereinafter referred to as the "**DPO**").

3. Data processed

The types of personal data that may be processed by the Companies referred to in point 1) of this policy include identification and contact data, such as, for example, name, surname, work activity, personal and company email and telephone contacts. In the event that consent is given for purpose g) referred to in the following paragraph of this document, the personal data processed may be included in the "Customer Relationship Management" (CRM), used to involve the Data Subject in future promotional initiatives and services, as part of the activities and projects, promoted and organized by Kirey Group. Personal data will be provided by the Data Subject, i.e. they may be collected through third parties who support Kirey Group in identifying potential customers.

4. Purpose of the processing, legal basis, retention period and nature of the provision of data

The purposes of the processing, as well as the related legal basis, the retention period and the nature of the provision of data are set out below:

a) ***Tax and corporate accounting obligations.***
b) ***Customer management.***
c) ***Management of information flows pursuant to Article 6, paragraph 1 and paragraph 2 of Legislative Decree 231/2001*** *(for companies with MOGC 231).*
d) ***Litigation management.***
e) ***Management of legal and contractual issues.***
f) ***Direct marketing.***
g) ***Communications of a commercial nature.***
h) ***Management and maintenance of the good relationship with the customer.***

Legal basis: the processing for purpose g) is based on the consent of the data subject pursuant to Article 6(1)(a) GDPR. The processing will be based, if provided, on free, express and unequivocal consent.

The processing for purposes b), e), h) is necessary for the execution of pre-contractual and/or contractual measures. The processing is, therefore, lawful pursuant to art. 6, par. 1, lit. b) of the GDPR.

Processing for purposes a), c), d) the processing is necessary to comply with a legal obligation to which the Joint Data Controllers are subject. The processing is, therefore, lawful pursuant to art. 6, paragraph 1, letter c).

the processing for purpose f) is based on art. 6, paragraph 1, letter f) legitimate interest and recital 47, the processing is necessary for the pursuit of the legitimate interest of the Data Controller or of Third Parties, provided that the interests or fundamental rights and freedoms of the data subject which require the protection of personal data do not prevail, taking into account the reasonable expectations entertained by the data subject on the basis of his or her relationship with the Data Controller.

Data retention period: personal data are kept for the time necessary to achieve the purposes pursued and/or the time necessary to defend or assert a right in court, in any case no longer than 10 years. Personal data whose legal basis is consent will be stored for a maximum of 12 months and in any case until the withdrawal of consent.

Nature of the provision: the provision of data is mandatory, as it is essential to be able to execute contractual obligations and to comply with a legal obligation to which the Data Controller is subject. For the purposes whose legal basis is consent, the provision of data is optional and in the absence of the same, your data will not be processed for the pursuit of this purpose.

5. Recipients or categories of recipients of the data

Personal data will not be disseminated. Personal data may, on the other hand, be communicated and processed: by specifically authorised persons acting pursuant to Article 29 of the GDPR and Article 2 quaterdecies of Legislative Decree 101/2018 (including any System Administrators appointed for this purpose, the list of which can be requested from the Companies), under the authority of the Companies referred to in point 1), to external parties who will process the data as independent Data Controllers or to Data Processors pursuant to Article 28 of the GDPR on the basis of specific instructions provided regarding the purposes and methods of processing.

6. Data transfer to a third country and/or an international organisation and safeguards

The personal data collected and processed will not be transferred outside the EEA countries under any circumstances.

7. Processing methods

The collection and processing of personal data will be carried out through manual, computerized and telematic tools and with logics strictly related to the purposes themselves.

Please note that fully automated decision-making processes are not carried out.

8. Rights of the data subjects

The Data Subject may assert his/her rights pursuant to Articles 15-22 of the GDPR, by contacting each Company, by sending an e-mail to the privacy@kireygroup.com address or by writing to the contacts referred to in paragraph 2 of this Privacy Policy.

The Data Subject has the right, at any time, to ask the Companies for access to his or her personal data (Article 15), the rectification (Article 16) or erasure (Article 17) of the same, or the limitation of processing (Article 18). The Companies shall notify (art. 19) to each of the recipients to whom the personal data have been transmitted any rectifications or cancellations or limitations of processing carried out. The Companies shall notify the Data Subject of these recipients if the Data Subject so requests. In the cases envisaged, you have the right to withdraw the consent given without prejudice to the lawfulness of the processing based on consent before its withdrawal. In addition, the data subject has the right to object to the processing of data, including for processing based on legitimate interest. In the event that the Data Subject considers that the processing of personal data carried out is in violation of the provisions of the GDPR, the Data Subject has the right to lodge a complaint with the Supervisory Authority, in particular in the Member State where he or she habitually resides or works or in the place where the alleged violation of the regulation occurred (the contacts of the Data Protection Authority are available at the following link: https://www.garanteprivacy.it/home/footer/contatti), or to bring the appropriate proceedings.

Updated date: **July 2026**