



PRIVACY & COOKIE POLICY

pursuant to Article 13 of Regulation (EU) 2016/679 (hereinafter the 'Regulation') on the protection of natural persons with regard to the processing of personal data

Dear,

Markas S.r.l., as the Data Controller, wishes to inform you that the personal data you have provided will be processed in accordance with the principles set out in the Regulation: lawfulness, fairness and transparency.

1. Purposes of data processing and legal basis for processing

The personal data provided will be processed for the following purposes:

- To improve the user experience on the website (for example, through the use of cookies) – *“The processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party [...] – Article 6(1)(f) of the Regulation.*
- To manage enquiries and contact requests – *“Processing is necessary for the performance of a contract to which the data subject is party or for the implementation of pre-contractual measures [...]” – Article 6(1)(b) of the Regulation* and – *“The processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party [...] – Article 6(1)(f) of the Regulation.*
- Handling enquiries received via the Contact Form and preparing personalised quotations for the services offered by Markas. The data will be used exclusively to respond to the contact initiated by the data subject and to define the financial and technical terms of the service requested – *the processing is necessary for the performance of pre-contractual measures taken at the request of the data subject [...] – Article 6(1)(b) of the Regulation.*
- Subject to the data subject's explicit consent, the contact details provided in the Contact Form section may be processed for direct marketing purposes, consisting of contacting the data subject in the future to propose commercial offers, promotions or updates on services similar to those for which the initial contact was requested. This will be carried out via traditional means of contact and does not involve subscription to automated newsletter services. – *The data subject has given consent to the processing of their personal data for one or more specific purposes [...] – Article 6(1)(a) of the Regulation.*
- Subject to the Data Subject's explicit consent, in relation to the data provided in the Contact Form section, Markas may carry out internal categorisation and profiling of the data collected during contacts, in order to place the Data Subject into specific clusters or categories. This process is aimed exclusively at improving the relevance of commercial communications and the effectiveness of the services offered, making them more closely aligned with the user's actual needs. – *The data subject has given consent to the processing of their personal data for one or more specific purposes [...] – Article 6(1)(a) of the Regulation.*
- Marketing activities: monthly analysis of the number of people who visited the Markas corporate website, which pages were visited, the time spent on the website or on specific pages of the website, and the referrer that led to the visit to the landing page, namely the Markas corporate website. – *The data subject has given consent to the processing of their personal data for one or more specific purposes [...] – Article 6(1)(a) of the Regulation.*



2. Provision of data

This website uses technical cookies and analytical cookies – which are similar to technical cookies – that are essential for carrying out activities strictly necessary for the proper functioning of the website and for ensuring the best browsing experience; the User's consent is not required for these.

The website also uses third-party cookies (Matomo, Google Maps and YouTube), the use of which is subject to the visitor's consent, which may therefore be given, refused or subsequently withdrawn.

The personal data provided by completing the Contact Form is necessary to respond to requests for personalised quotes relating to the services offered by Markas. Without this data, the specific request cannot be processed.

3. Types of data processed

The data collected may include:

- Browsing data (IP address, cookies, logs, etc.);
- Personal and contact details (first name, surname, email address, telephone number, data voluntarily sent to the organisation's contact email addresses and via the Contact Form section)

4. Methods of data processing

The data will be processed by Markas S.r.l.:

- using computerised and/or electronic means;
- by staff authorised to carry out such tasks;
- with appropriate organisational and technical measures to ensure the confidentiality of the data and prevent access by unauthorised third parties.

5. Duration of processing

Personal data is retained only for as long as necessary to fulfill the purposes for which it was collected and processed, and this period is specifically tied to the type of data being processed, as explicitly indicated in the Record of Processing Activities, in the relevant privacy notices regarding the processing of personal data, and in company procedures. In any case, personal data will be processed for a period not exceeding 2 years, after which it will be deleted or anonymized.

If the data subject has requested information about Markas's services through the dedicated section (Contact Form), the personal data provided is retained only for as long as necessary to fulfill the purposes for which it was collected and, in any case, for a period not exceeding 5 years, after which it will be deleted or anonymized.

6. Rights of the data subject

Under current legislation, the data subject may, upon request, access their personal data at any time. The data subject has the right to withdraw their consent at any time. Furthermore, if they consider the data to be inaccurate or incomplete, they may request that it be rectified or supplemented respectively; where the legal conditions are met, they may object to the processing of their data, request its erasure or request that processing be restricted. In the latter case, with the exception of storage, personal data subject to restriction of processing may only be processed with the consent of the data subject, for the legal defence of a right of the data controller, for the protection of the rights of a third party, or for reasons of substantial public interest. Should the data subject have exercised their rights pursuant to Articles 16, 17(1) and 18 of Regulation (EU) 2016/679, Markas S.r.l. will notify the recipients to whom the personal



data have been disclosed of any rectifications, erasures or restrictions on processing that have been carried out. The data subject also has the right to data portability to another data controller.

If you consider that your rights have been infringed, you have the right to lodge a complaint with the Data Protection Authority: www.garanteprivacy.it

7. Disclosure of data to third parties

In relation to the purposes set out above, your personal data may be disclosed to third parties with whom the Data Controller has a contractual relationship, appointed as Data Processors (Article 28 of EU Regulation 2016/679), where such disclosure is necessary or essential for the performance of our business activities.

The data collected may be provided to companies within the Markas Group solely for the purposes set out above and processed by authorised personnel. Your data will not be used in automated decision-making processes.

8. Cookies

Cookies are text strings that websites visited by users (so-called 'first-party' sites) or other websites/web servers (so-called 'third-party' sites) place and store on the user's device, so that they can be sent back to those sites on the user's next visit.

There are various types of cookies: this website uses technical cookies. Full details regarding their use are set out below.

Description of technical cookies

Technical cookies are used to ensure that certain features of the website function correctly. These include navigation and session cookies, which enable users to navigate the website smoothly; so-called analytics cookies, which are treated as technical cookies when used directly by the website operator to collect information, in aggregate form, on the number of users and how they visit the website; and finally, functionality cookies, which allow the user to navigate the site according to a set of selected criteria (for example, language, selected filters, etc.) in order to improve the service provided.

Technical cookies are not used to collect personal information for marketing purposes.

No prior consent from users is required for the installation of these cookies, but users can always manage or disable them by changing their browser settings. Normally, this setting can be found in the 'Privacy' or 'Cookies' section of the 'Help' menu or in the website's 'Properties' menu. Please note that disabling technical cookies may affect the functioning of certain features on our website.

Third-party technical cookies

The company website also uses third-party technical cookies to improve the user's browsing experience and to collect information on website usage.

Non-technical third-party cookies

Below, for each of these, information is provided regarding the name, duration and, in terms of usage, the purposes for which and the manner in which they are used on our company website.

Visitors may give or withdraw their consent to the use of these cookies at any time by adjusting their preferences via the banner available on the company website. In particular, users can use their browser settings to:

- See which cookies have been set on their device;



- Accept all cookies or only some of them;
- Reject non-technical cookies.

Matomo

Matomo is open-source analytics software and offers a GDPR-compliant alternative to Google Analytics for some users. The data collected via Matomo cookies is used to optimise navigation on our website; specifically, it is used to collect anonymous data on users' behaviour whilst browsing the site, such as the pages visited, the time spent on the site, the number of clicks on links, etc. Matomo also stores the visitor's IP address, but anonymises it by modifying the last two bytes, so that it can no longer be uniquely associated with a specific individual. The following cookies are processed:

- `_pk_id.1.8045` – 13 months – Stores a unique visitor ID.
- `_pk_ref.1.8045` – 6 months – Stores attribution information (the referrer that brought the visitor to the website, i.e. the information regarding where the visitor came from before landing on the Markas company page)
- `_pk_ses.1.8045` – 30 minutes – A session cookie that temporarily stores visit data.

YouTube

We use YouTube as a platform to share video content linked to our company website. The following cookies are processed:

- `_Secure-ROLLOUT_TOKEN` – 6 months – Used by YouTube to manage the roll-out of features and the testing phase.
- `VISITOR_INFO1_LIVE` – 6 months – Set by YouTube and used for various purposes, including analytics and advertising.
- `VISITOR_PRIVACY_METADATA` – 6 months – Stores the user's privacy and consent settings for embedded videos.

Google Maps

We use Google Maps to provide interactive maps, directions and to help users locate our services. The following cookies are processed:

- `YSC` – Session – Set by the YouTube video service to track views.
- `AEC` – 6 months – Used to detect spam, fraud and abuse, ensuring the integrity of advertising interactions and the remuneration of YouTube creators.
- `NID` – 6 months – Contains a unique ID used by Google to remember preferences and other information (language, results per page, SafeSearch, etc.).
- `SOCS` – 390 days – Stores the user's cookie-related decisions.

Links to social media

The website contains links to other websites, such as Facebook, Instagram and LinkedIn. These are simply links and not plugins. Responsibility for ensuring compliance with data protection regulations lies with the respective provider. We have no influence over the compliance of the respective operators with data protection regulations. Further information on data processing can be found in the respective privacy policies available on these providers' websites.



9. Data controller

Markas S.r.l., located at Via Macello 61 (39100), Bolzano, Italy.

Telephone: (+39)0471307611

Email: IT-privacy@markas.com

10. Data Protection Officer (DPO)

ReNorm S.r.l., represented by Dr. Andrea Avanzo, Via Antonio Stradivari 4 - 39100 - Bolzano (BZ).

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