



## INFORMATION PURSUANT TO ART. 13 AND 14 OF REG. (EU) 2016/679 ("GDPR")

Amilon provides below the information required by the GDPR regarding the processing of personal data related to the registration on the [www.ideashopping.com/portal](http://www.ideashopping.com/portal) ("Portal") and the use of the related services by users ("User/s") – in particular, the purchase of gift cards and ideaShopping (also in favor of a third party, "Beneficiary") – as better governed by the general terms and conditions of contract (terms of use and conditions of sale, available in the footer of the Portal).

### 1. Sources and categories of data processed – nature of the provision

As indicated in the terms of use, the User, in order to use their Shopping idea on the Portal, must:

1. register for the same (i) by filling out the appropriate form, with the insertion of name and surname, e-mail address, telephone number, province of residence, as well as creating a password (being able to optionally add the address of residence, age group and gender) or (ii) authenticating using the so-called "Password" or (ii) authenticating using the CD. "social login", i.e. using your Facebook or Google account (in this case, the reference provider will transmit the following data to Amilon: e-mail address, alphanumeric identification code, date of registration on the Portal, reference provider and last access to the latter), and then log in using your credentials, or
2. access in "guest" mode; in this case you will have to enter the "code" of your ideaShopping, as well as provide the number of your mobile phone, where you will receive the security code for identity confirmation.

If the User limits himself to purchasing a Shopping idea (also possible without authentication), he will only have to indicate the e-mail address to which it is to be delivered.

If the User decides to give the Gift Card / ideaShopping to a Beneficiary, he/she will provide his/her data to Amilon for delivery purposes (name and surname, e-mail address), as well as specifying his/her data (name and surname, e-mail address).

Amilon also processes the Users' credit card data (and communicates them to the so-called "Amilon Party"): "acquirer", i.e. the payment service provider that manages the payment, acting as an independent data controller), as well as purchase information.

Information on the processing of browsing data and those relating to the use of cookies can be consulted in the privacy and cookie policy made available in the cookie banner that appears at the first access and in the footer of the Portal.

### 2. Identity and contact details of the controller

The Data Controller is **Amilon S.r.l.**, Tax Code and VAT No. 05921090964, with registered office in via Natale Battaglia n. 12, Milan, e-mail address [privacy@amilon.eu](mailto:privacy@amilon.eu) ("Amilon" or "Data Controller").

### 3. Contact details of the Data Protection Officer (DPO)

The DPO can be contacted at the e-mail address [dpo-ext@amilon.eu](mailto:dpo-ext@amilon.eu).

### 4. Purposes of processing, legal bases and data retention times

WHY IS PERSONAL DATA PROCESSED?	WHAT IS THE CONDITION THAT MAKES THE TREATMENT LAWFUL?	HOW LONG DO WE KEEP PERSONAL DATA?
<p>a. To <b>allow registration on the Portal and the use of the related services</b>, also as a "guest" User.</p> <p>Among the services provided there could be a special chatbot, based on an artificial intelligence system, for the <b>management of requests for assistance by the User</b>. It should be noted that the data provided will also be processed in order to improve the effectiveness of the chatbot, so that over time it provides increasingly adequate and relevant answers to requests for assistance. You can always call on a human operator for assistance.</p>	<p><b>The performance of a contract</b> to which the User is a party (or in favour of which the contract is concluded, in the case of the Beneficiary).</p> <p>The pursuit of the <b>legitimate interest of the Data Controller</b> for the processing of data for the purpose of training the chatbot.</p>	<p>For the entire duration of the contractual relationship with Amilon (registration on the Portal) and, as an ordinary limitation period, for the following 10 years.</p> <p>In the event of litigation, the data are kept until the expiry of the terms of appeal actions.</p>
<p>b. To establish, exercise or <b>defend the rights of Amilon</b>.</p> <p>In order to mitigate the risk of fraud in payments on the Portal, the following are provided:</p>	<p>The pursuit of the <b>legitimate interest of the Data Controller</b>.</p>	

- the identification of Users (by means of confirmation via mobile phone);
- the carrying out of checks on the credit card data entered during the User's purchase.

c. To fulfil administrative-accounting, tax and other legal obligations, in accordance with the requirements of current legislation.	The fulfilment of a legal obligation to which the Data Controller is subject.	The data will be stored for 10 years, as a general ten-year retention period prescribed by law.
d. To send – to the e-mail address provided by the User – promotional communications regarding products supplied by Amilon similar to those purchased on the Portal (e.g. regarding the addition of a new gift card in the catalogues of Amilon's e-commerce sites or relating to a particular discount applied to a certain brand of gift cards sold therein).	The so-called "Tax Authority". "soft spam" referred to in art. 130, c. 4 of Legislative Decree no. 196/2003 ("Privacy Code").	Until the data subject opposes (by clicking on the "unsubscribe" link in each communication).
e. To carry out profiled marketing activities, i.e. the processing of a user profile on the basis of the data provided by the user (during registration and purchase) in combination with information relating to navigation on the Portal (inferred, in particular, from online clicks on certain products/sections) collected through cookies, in order to allow Amilon to offer promotional messages and/or online content that are more in line with this profile, through automated contact methods (such as personalized emails) and/or online advertising banners.	The User's consent, which is optional and can be revoked at any time.	The data will be stored for 3 years, without prejudice to the User's right to object (also by clicking on the "unsubscribe" link in each communication) or to revoke the latter's consent.

After the expiry of the storage terms indicated above, the data will be destroyed, deleted or made anonymous, compatibly with the technical timing of deletion and backup.

## 5. Provision of data

As clarified above, the provision of data marked with an asterisk is necessary for registration on the Portal.

The insertion of the telephone number is necessary to use the services of the Portal in "guest" mode.

Therefore, failure to provide the aforementioned data will make it impossible for Users to use the services offered by Amilon on the Portal.

## 6. Categories of data recipients

The data may be processed by third parties operating as independent data controllers, such as, for example, public authorities and professional firms, entitled to receive them, as well as the so-called "data controller". *acquirer* at the payment stage as indicated above (par. 1) and the anti-fraud service provider (Riskified Ltd).

The data may also be processed, on behalf of the Data Controller, by third parties, designated as data processors pursuant to Article 28 of the GDPR, who carry out activities functional to the pursuit of the above purposes (e.g. suppliers of IT, customer care and marketing services).

In addition, the data are processed by Amilon employees - belonging to the company functions responsible for pursuing the purposes indicated above - who have been expressly authorized to process the data and who have received adequate operating instructions.

## 7. Rights of the data subjects

The data subjects (i.e. the subjects to whom the data refer; i.e., User and Beneficiary) may exercise the rights referred to in art. 15-22 of the GDPR, by sending a communication to the contact points indicated in par. 2.

In particular, the data subjects may obtain from the Data Controller confirmation as to whether or not personal data concerning them is being processed and, if so, access to the same and to the information referred to in art. 15 of the GDPR, the rectification of inaccurate data, the integration of incomplete data, the deletion of data in the cases provided for by art. 17 of the GDPR, the limitation of processing in the cases provided for by art. 18 of the GDPR, as well as object, for reasons related to their particular situation, to the processing carried out for the legitimate interest of the data controller; In addition, if the processing is based on consent or contract and is carried out by automated means, they may request to receive the data in a structured, commonly used and machine-readable format, as well as, if technically feasible, to transmit them to another controller without hindrance ("right to portability").

As indicated above, data subjects may, at any time, revoke the consent given and object to the processing for direct marketing purposes (also by clicking on the "*unsubscribe*" link in each e-mail communication).

In any case, data subjects have the right to lodge a complaint with the competent supervisory authority in the Member State where they habitually reside or work or in the State where the alleged infringement occurred.