

**INFORMATION REGARDING THE PROCESSING OF PERSONAL DATA
PURSUANT TO ARTICLES 13 AND/OR 14 OF REGULATION (EU) 2016/679 ("GDPR")**

DATA CONTROLLER

Elica S.p.A. - Via Ermanno Casoli, no. 2, 60044 Fabriano (AN), VAT No. AN 00096570429, certified email address: elicaspa@sicurezzapostale.it, Telephone: +39-07326101 (hereinafter also the "**Company**" or "**Data Controller**").

DATA PROTECTION OFFICER

The Company has appointed a Data Protection Officer ("DPO"), who can be contacted at dpo@elica.com.

- A. Contacts
- B. Newsletter
- C. Elica Product Registration
- D. Members' Area
- E. E-Shop

A. CONTACTS

CATEGORY OF PERSONAL DATA PROCESSED

The Company will process personal data such as, but not limited to, user type, name, surname, gender, email, telephone number, mobile number, country, zip code, city, address, company, purchased goods, and any other information freely provided by the interested party (hereinafter also referred to as the user or customer) in the "Message" and "Attachment" sections (hereinafter, collectively, "**Data**").

The Company will ignore and immediately delete any unnecessary Data provided in error.

DATA SOURCE

The Data may be collected directly from the interested party or from third parties, such as retailers who contact the Company on behalf of the user/customer to request technical assistance, to obtain information on the purchase of products, spare parts and accessories, or on the installation or operation of products already purchased.

PURPOSE OF PROCESSING

The Data will be processed by the Company for the purposes described below.

- a) Responding to user requests received through:
 - i. the completion of forms available on the Company's website (www.elica.com) for various types of requests, which may concern: technical assistance, accessories and spare parts, product maintenance, product installation, online shop: orders and returns, product registration, how to purchase a product, support and commercial requests, become a partner, Press & Media, Privacy and data processing; or
 - ii. telephone contact, when users – or retailers on behalf of users/customers – contact the dedicated number made available by the Company to request technical assistance, obtain information on the purchase of hoods, cooktops and Elica S.p.A. products, receive information on spare parts and accessories, or on the installation or operation of products already purchased;
- b) research and statistical analysis activities of the Data in a general and aggregated form, aimed at guiding the Company's strategic choices;
- c) sending, by e-mail, commercial/advertising communications relating to products/services similar to those previously purchased (so-called "soft spam");
- d) customer satisfaction activities, through the sending of a post-technical assistance questionnaire by e-mail, the completion of which is optional, in order to verify and improve the quality of the services offered and the level of customer satisfaction;
- e) direct marketing, to send, by e-mail, commercial communications relating to offers, discounts, promotions and news about the Company's products and/or services, using automated or telephone contact methods;
- f) profiling marketing; analysis of interests inferred by combining Data relating to the data subject's habits and interactions (e.g. purchase details, product reviews, participation in an event, contact for technical assistance) in order to send personalized commercial communications, using automated or telephone contact methods or by sharing, within the spaces available on Meta social network personal pages, brand sponsorship campaigns for the "Elica" brand;
- g) where necessary, to ascertain, exercise and/or defend the rights of the Data Controller in judicial proceedings.

LEGAL BASIS

The legal bases, with reference to the individual processing purposes indicated above, are as follows:

- for purpose a), the performance of pre-contractual measures or contractual measures taken at the request of the data subject, pursuant to Article 6(1)(b) of the GDPR;
- for purpose b), the legitimate interest of the Data Controller, pursuant to Article 6(1)(f) of the GDPR;
- for purpose c), the legitimate interest of the Data Controller, pursuant to Article 130(4) of Legislative Decree no. 196/03, as amended by Legislative Decree no. 101/2018 (the so-called “Privacy Code”);
- for purpose d), the legitimate interest of the Data Controller, pursuant to Article 6(1)(f) of the GDPR;
- for purpose e), the consent of the data subject, pursuant to Article 6(1)(a) of the GDPR;
- for purpose f), the consent of the data subject, pursuant to Article 6(1)(a) of the GDPR;
- for purpose g), the legitimate interest of the Data Controller, pursuant to Article 6(1)(f) of the GDPR.

RETENTION PERIOD

The Data collected and processed by the Company will be retained for the periods indicated below. In particular, with reference to:

- purpose a): for general product-related requests, for the period strictly necessary to provide a response based on the type of request submitted by the data subject. In any case, this period shall not exceed 12 months from the date of collection, except for technical assistance requests, for which the retention period is 10 years;
- purpose b): for the time necessary to achieve the relevant purpose and, in any event, until the data subject objects to the processing. Even after the expiration of the retention period, the Company may continue to process the Data in an aggregated and anonymized form for statistical purposes;
- purpose c): for a period of 5 years and, in any event, until the data subject exercises the right to object;
- purpose d): for a period of 12 months from the closure of the after-sales service activity, for the purpose of analyzing the service and undertaking actions aimed at its improvement;
- purposes e) and f): personal identification and contact data will be retained until consent is withdrawn and, in any case, until the end of the relationship with the data subject. Data relating to the details of the data subject’s interactions with the Company will be retained for 5 years from the collection of Data relating to habits and interactions (e.g. purchase details, product reviews, participation in an event, contact for technical assistance, contact for product registration or warranty extension), for both direct marketing and profiling marketing purposes;
- purpose g): for the duration of any litigation, until the expiration of the time limits for bringing appeals.

Upon expiration of the retention periods indicated above, the Data will be deleted or anonymized, in accordance with the applicable technical procedures for deletion and backup.

B. NEWSLETTER

CATEGORIES OF PERSONAL DATA PROCESSED

The Company will process personal data such as, by way of example and not limitation, first name, last name, e-mail address, country, and user type (hereinafter, the “Data”).

PURPOSES OF THE PROCESSING

- a) The Data will be processed by the Company for the following purposes:
- b) a sending informational communications (newsletters) by e-mail, in order to keep users who have requested them updated on news relating to the Company’s group and on the organization of events such as trade fairs and conferences;
- c) b. research and statistical analysis activities carried out on the Data in a general and aggregated form, aimed at guiding the Company’s strategic decisions;
- d) c. direct marketing, to send commercial communications by e-mail relating to offers, discounts, promotions, and news about the Company’s products and/or services, using automated or telephone contact methods;
- e) d. profiling marketing; analysis of interests inferred by combining Data relating to the data subject’s habits and interactions (e.g. purchase details, product reviews, participation in an event, contact for technical assistance) in order to send personalized commercial communications, using automated or telephone contact methods or by sharing, within the spaces available on personal pages of Meta social networks, brand sponsorship campaigns for the “Elica” brand;
- f) e. where necessary, to ascertain, exercise, and/or defend the rights of the Data Controller in judicial proceedings.

LEGAL BASIS

The legal bases for the processing, with reference to the individual purposes indicated above, are as follows:

- purpose a): the performance of pre-contractual or contractual measures taken at the request of the data subject, pursuant to Article 6(1)(b) of the GDPR;
- purpose b): the legitimate interest of the Data Controller, pursuant to Article 6(1)(f) of the GDPR;
- purpose c): the consent of the data subject, pursuant to Article 6(1)(a) of the GDPR;
- purpose d): the consent of the data subject, pursuant to Article 6(1)(a) of the GDPR;
- purpose e): the legitimate interest of the Data Controller, pursuant to Article 6(1)(f) of the GDPR.

RETENTION PERIOD

The Data collected and processed by the Company will be retained for the periods indicated below. In particular, with reference to:

- purpose a): until the data subject requests deletion from the service;
- purpose b): for the time necessary to achieve the relevant purposes and, in any event, until the data subject objects to the processing. Even after the expiration of the retention period, the Company may continue to process the Data in an aggregated and anonymized form for statistical purposes;
- purposes c) and d): personal identification and contact data will be retained until consent is withdrawn and, in any case, until the end of the relationship with the data subject. Data relating to the details of the data subject's interactions with the Company will be retained for 5 years from the collection of Data relating to habits and interactions (e.g. purchase details, product reviews, participation in an event, contact for technical assistance, contact for product registration or warranty extension), for both direct marketing and profiling marketing purposes;
- purpose e): for the duration of any litigation, until the expiration of the time limits for bringing appeals.

Upon expiration of the retention periods indicated above, the Data will be deleted or anonymized, in accordance with the applicable technical procedures for deletion and backup.

C. PRODUCT REGISTRATION

CATEGORIES OF PERSONAL DATA PROCESSED

The Company will process personal data such as, by way of example and not limitation, first name, last name, e-mail address, telephone number, country, address, city, postal code, and user type (hereinafter, the “**Data**”).

PURPOSES OF THE PROCESSING

The Data will be processed by the Company for the following purposes:

- a) use of the “Register Your Product” service. This service allows the data subject to register the product for the purposes of the statutory warranty and/or to extend the warranty on the purchased product(s) for a total period of 5 years or 7 years, depending on the type of registered product;
- b) sending commercial/advertising communications by e-mail relating to products/services similar to those previously purchased (so-called “soft spam”);
- c) sending informational communications (newsletters) by e-mail, in order to keep users who have requested them informed about news relating to the Company's group and the organization of events such as trade fairs and conferences;
- d) research and statistical analysis activities carried out on the Data in a general and aggregated form, aimed at guiding the Company's strategic decisions;
- e) direct marketing, to send commercial communications by e-mail relating to offers, discounts, promotions, and news about the Company's products and/or services, using automated or telephone contact methods;
- f) profiling marketing; analysis of interests inferred by combining Data relating to the data subject's habits and interactions (e.g. purchase details, product reviews, participation in an event, contact for technical assistance) in order to send personalized commercial communications, using automated or telephone contact methods or by sharing brand sponsorship campaigns for the “Elica” brand within the spaces available on personal pages of Meta social networks;
- g) customer satisfaction activities, through the sending of a post-technical assistance questionnaire by e-mail, the completion of which is optional, in order to verify and improve the quality of the services offered and the level of customer satisfaction;
- h) where necessary, to ascertain, exercise, and/or defend the rights of the Data Controller in judicial proceedings.

LEGAL BASIS

The legal bases for the processing, with reference to the individual purposes indicated above, are as follows:

- purpose a): the performance of pre-contractual or contractual measures taken at the request of the data subject, pursuant to Article 6(1)(b) of the GDPR;
- purpose b): the legitimate interest of the Data Controller, pursuant to Article 130(4) of Legislative Decree No. 196/03, as amended by Legislative Decree No. 101/2018 (the so-called “Privacy Code”);
- purpose c): the performance of pre-contractual or contractual measures taken at the request of the data subject, pursuant to Article 6(1)(b) of the GDPR;
- purpose d): the legitimate interest of the Data Controller, pursuant to Article 6(1)(f) of the GDPR;
- purpose e): the consent of the data subject, pursuant to Article 6(1)(a) of the GDPR;
- purpose f): the consent of the data subject, pursuant to Article 6(1)(a) of the GDPR;
- purpose g): the legitimate interest of the Data Controller, pursuant to Article 6(1)(f) of the GDPR;
- purpose h): the legitimate interest of the Data Controller, pursuant to Article 6(1)(f) of the GDPR.

RETENTION PERIOD

The Data collected and processed by the Company will be retained for the periods indicated below. In particular, with reference to:

- purpose a): for the duration of the statutory warranty period of 2 years, or for the extended warranty period of 5 years or 7 years, depending on the product registered by the data subject;
- purpose b): for a period of 5 years and, in any event, until the data subject exercises the right to object;
- purpose c): until the data subject requests deletion from the service;
- purpose d): for the time necessary to achieve the relevant purposes and, in any event, until the data subject objects to the processing. Even after the expiration of the retention period, the Company may continue to process the Data in an aggregated and anonymized form for statistical purposes;
- purposes e) and f): personal identification and contact data will be retained until consent is withdrawn and, in any case, until the termination of the relationship with the data subject. Data relating to the details of the data subject’s interactions with the Company will be retained for 5 years from the collection of Data relating to habits and interactions (e.g. purchase details, product reviews, participation in an event, contact for technical assistance, contact for product registration or warranty extension), for both direct marketing and profiling marketing purposes;
- purpose g): for a period of 12 months from the closure of the after-sales service activity, for the purpose of analyzing the service and undertaking actions aimed at its improvement;
- purpose h): for the duration of any litigation, until the expiration of the time limits for bringing appeals.

Upon expiration of the retention periods indicated above, the Data will be deleted or anonymized, in accordance with the applicable technical procedures for deletion and backup.

D. RESTRICTED AREA

CATEGORIES OF PERSONAL DATA PROCESSED

This restricted area is intended for both private users and trade/professional users. The Company will process personal data (hereinafter, the “Data”) such as, by way of example and not limitation For private users: first name, last name, username and password, e-mail address, telephone number, country, address, city, postal code, and user type; for trade/professional users: first name, last name, username and password, e-mail address, user type, professional studio/company, job role, country, and city.

PURPOSES OF THE PROCESSING

The Data will be processed by the Company for the following purposes:

- registration to the restricted area and subsequent profile management, distinguishing between two types of accounts:
 - private account, enabling the user to manage their restricted area and access dedicated services such as, by way of example, product registration;
 - trade/professional account, enabling access to dedicated services such as, by way of example, downloading 3D product files and technical documentation, online installation tutorials, and product training videos;
- sending commercial/advertising communications by e-mail relating to products/services similar to those previously purchased (so-called “soft spam”);
- research and statistical analysis activities carried out on the Data in a general and aggregated form, aimed at guiding the Company’s strategic decisions;
- direct marketing, to send commercial communications by e-mail relating to offers, discounts, promotions, and news about the Company’s products and/or services, using automated or telephone contact methods;
- profiling marketing, consisting of the analysis of interests inferred by combining Data relating to the data subject’s habits and interactions (e.g. purchase details, product reviews, participation in an event, contact for technical assistance), in order to send personalized commercial communications, using automated or telephone contact

- methods or by sharing brand sponsorship campaigns for the “Elica” brand within the spaces available on personal pages of Meta social networks;
- f) where necessary, to ascertain, exercise, and/or defend the rights of the Data Controller in judicial proceedings.

LEGAL BASIS

The legal bases for the processing, with reference to the individual purposes indicated above, are as follows:

- purpose a): the performance of pre-contractual or contractual measures taken at the request of the data subject, pursuant to Article 6(1)(b) of the GDPR;
- purpose b): the legitimate interest of the Data Controller, pursuant to Article 130(4) of Legislative Decree No. 196/03, as amended by Legislative Decree No. 101/2018 (the so-called “Privacy Code”);
- purpose c): the legitimate interest of the Data Controller, pursuant to Article 6(1)(f) of the GDPR;
- purpose d): the consent of the data subject, pursuant to Article 6(1)(a) of the GDPR;
- purpose e): the consent of the data subject, pursuant to Article 6(1)(a) of the GDPR;

RETENTION PERIOD

The Data collected and processed by the Company will be retained for the periods indicated below. In particular, with reference to:

- purpose a): until they are deleted by the data subject, either by removing their profile or, alternatively, by contacting the Company. In the event of inactivity by the data subject for a period of 24 months, the Data will be deleted, with the user being notified 30 days prior to deletion, unless the user accesses their restricted area within the indicated period;
- purpose b): for a period of 5 years and, in any event, until the data subject exercises the right to object;
- purpose c): for the time necessary to achieve the relevant purposes and, in any event, until the data subject objects to the processing. Even after the expiration of the retention period, the Company may continue to process the Data in an aggregated and anonymized form for statistical purposes;
- purposes d) and e): personal identification and contact data will be retained until consent is withdrawn and, in any case, until the end of the relationship with the data subject. Data relating to the details of the data subject’s interactions with the Company will be retained for 5 years from the collection of Data relating to habits and interactions (e.g. purchase details, product reviews, participation in an event, contact for technical assistance, contact for product registration or warranty extension), for both direct marketing and profiling marketing purposes;
- purpose f): for the duration of any litigation, until the expiration of the time limits for bringing appeals.

Upon expiration of the retention periods indicated above, the Data will be deleted or anonymized, in accordance with the applicable technical procedures for deletion and backup.

E. SHOP

CATEGORIES OF PERSONAL DATA PROCESSED

The Company will process personal data such as, by way of example and not limitation, first name, last name, e-mail address, telephone number, country, address, city, and postal code (hereinafter, the “Data”).

The Company will process the Data in order to allow the user to complete the purchase of products available in the e-shop section of the Company’s website (www.elica.com) and to manage the purchase order. The user may complete the purchase as a “guest” by filling in the fields required in the checkout form, or by accessing their restricted area after completing the registration process through the relevant section of the website, as described [in the section of this privacy notice dedicated to the restricted area](#).

PURPOSES OF THE PROCESSING

The Data will be processed by the Company for the following purposes:

- a) completion of the purchase of products available in the e-shop section of the Company’s website (www.elica.com) and management of the order placed by the user;
- b) sending commercial/advertising communications by e-mail relating to products similar to those previously purchased (so-called “soft spam”);
- c) *customer satisfaction* activities, through the sending of a post-purchase questionnaire by e-mail, the completion of which is optional, in order to verify and improve the quality of the services offered and the level of customer satisfaction;
- d) research and statistical analysis activities carried out on the Data in a general and aggregated form, aimed at guiding the Company’s strategic decisions;

- e) where necessary, to ascertain, exercise, and/or defend the rights of the Data Controller in judicial proceedings.

LEGAL BASIS

The legal bases for the processing, with reference to the individual purposes indicated above, are as follows:

- purpose a): the performance of pre-contractual or contractual measures taken at the request of the data subject, pursuant to Article 6(1)(b) of the GDPR;
- purpose b): the legitimate interest of the Data Controller, pursuant to Article 130(4) of Legislative Decree No. 196/03, as amended by Legislative Decree No. 101/2018 (the so-called “Privacy Code”);
- purpose c): the legitimate interest of the Data Controller, pursuant to Article 6(1)(f) of the GDPR;
- purpose d): the legitimate interest of the Data Controller, pursuant to Article 6(1)(f) of the GDPR;
- purpose e): the legitimate interest of the Data Controller, pursuant to Article 6(1)(f) of the GDPR.

RETENTION PERIOD

The Data collected and processed by the Company will be retained for the periods indicated below. In particular, with reference to:

- purpose a): for the entire period necessary to manage the order and, in any event, no longer than 2 years from the date of purchase;
- purpose b): for a period of 5 years and, in any event, until the data subject exercises the right to object;
- purpose c): for a period of 12 months from the completion of the purchase, in order to analyze the sales service and undertake actions aimed at its improvement;
- purpose d): for the time necessary to achieve the relevant purpose and, in any event, until the data subject objects to the processing. Even after the expiration of the retention period, the Company may continue to process the Data in an aggregated and anonymized form for statistical purposes;
- purpose e): for the duration of any litigation, until the expiration of the time limits for bringing appeals.

Upon expiration of the retention periods indicated above, the Data will be deleted or anonymized, in accordance with the applicable technical procedures for deletion and backup.

PROVISION OF DATA

The provision of Data requested in fields marked with an asterisk (*) is necessary in order to respond to the data subject's requests and/or to use the services available on the Company's website. Failure to provide such Data will make it impossible to submit the request and/or use the desired service.

Conversely, the provision of Data not marked with an asterisk (*) is optional; therefore, failure to provide such Data, whether in whole or in part, will not prevent the submission of the request or the use of the service.

Without prejudice to the above, the provision of Data collected for processing purposes based on consent—which may be withdrawn at any time—is optional. In the event of failure to provide such Data, the Company will not process the Data for those purposes.

Processing based on the legitimate interest of the Data Controller is not mandatory, and the data subject may object to such processing in accordance with the procedures set out in the section “Data Subject Rights” of this privacy notice.

RECIPIENTS OF THE DATA

The Data may be disclosed to independent data controllers such as, by way of example, supervisory and control authorities and, more generally, public and private entities, as well as the company managing the backend activity of the e-commerce website, which are entitled to request such Data.

The Data may also be processed on behalf of the Data Controller by entities appointed as data processors pursuant to Article 28 of the GDPR, which receive appropriate operating instructions and provide the Company with services instrumental to the purposes indicated in this privacy notice, such as, by way of example: the company responsible for the maintenance/management of the Company's website and the electronic and/or telematic tools used by the same; the company managing the sending of commercial communications; the company providing telephone assistance through a call center; Meta Platforms Inc. in connection with brand sponsorship campaigns for the “Elica” brand carried out via social networks; as well as the company providing and maintaining the CRM system.

The complete list of data processors may be requested by writing to privacy@elica.com.

AUTHORIZED PERSONS

The Data may be processed by employees of the Company's departments responsible for pursuing the purposes indicated above, who have been expressly authorized to process personal data and have received appropriate operating instructions pursuant to Article 29 of the GDPR and Article 2-quaterdecies of Legislative Decree No. 196/2003, as amended by Legislative Decree No. 101/2018 (the so-called "Privacy Code").

TRANSFER OF DATA TO NON-EU COUNTRIES

The Data are not transferred to countries outside the European Union. In any event, should the Data be transferred to countries outside the European Union (EU) or the European Economic Area (EEA) that have not been deemed adequate by the European Commission, the transfer mechanisms provided for in Article 46 of the GDPR (such as standard contractual clauses) will be used, with an assessment of any "supplementary measures" necessary to ensure a level of protection substantially equivalent to that required under European Union law.

DATA SUBJECT RIGHTS – COMPLAINT TO THE SUPERVISORY AUTHORITY

To exercise their rights, the data subject may contact the Company at privacy@elica.com.

The data subject may request access to their Data, deletion of the Data, rectification of inaccurate Data, completion of incomplete Data, and restriction of processing in the cases provided for by Article 18 of the GDPR.

Where processing is based on consent or on a contract and is carried out by automated means, the data subject has the right to receive the Data in a structured, commonly used, and machine-readable format and, where technically feasible, to transmit them to another data controller without hindrance (right to data portability).

The data subject has the right to object at any time, easily and free of charge, on grounds relating to their particular situation, to the processing of the Data based on the legitimate interest of the Data Controller, in the cases provided for by Article 21 of the GDPR.

The data subject also has the right to withdraw consent at any time and to object to the receipt of promotional communications by contacting the Data Controller or by clicking the unsubscribe link at the bottom of each e-mail. Such withdrawal shall not affect the lawfulness of processing based on consent given prior to withdrawal.

When the data subject intends to exercise their rights, the Company may—where there are reasonable doubts as to the data subject's identity—request identification before processing the request.

Finally, the data subject has the right to lodge a complaint with the competent supervisory authority in the Member State in which they habitually reside or work, or in the Member State in which the alleged infringement occurred.

Last updated: December 2025