

Website Privacy Notice – last updated 24th May 2018

Thermoplay S.p.A. respects your right to privacy. This Privacy Notice explains how we collect, share and use personal information about you, and how you can exercise your privacy rights. This Privacy Notice only applies to personal information that we collect through our website at www.thermoplay.com.

If you have any questions or concerns about our use of your personal information, please contact us using the contact details provided at the bottom of this Privacy Notice.

What personal information do we collect and why?

We may collect the following categories of personal information:

- Information that you provide voluntarily
Certain parts of our Website may ask you to provide personal information voluntarily: for example, we may ask you to provide your contact details in order to register an account with us, to subscribe to marketing communications from us, when submitting feedback, questions and requests, completing surveys and/or participating in online promotions. The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.
- Information that we collect automatically
When you visit our Website, we may collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g., country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors.

Some of this information may be collected using cookies or similar tracking technology.

In general, we will use the personal information we collect from you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your personal information. However, we may also use your personal information for other purposes that are not incompatible with

the purposes we have disclosed to you (such as archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes) if and where this is permitted by applicable data protection laws.

Who do we share your personal information with?

We may disclose your personal information to the following categories of recipients:

- Our group companies, third party services providers and partners who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Website), or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information;
- Any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- An actual or potential buyer (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice; and/or
- Any other person with your consent to the disclosure.

Legal basis for processing personal information (EEA visitors only)

If you are a visitor from the European Economic Area, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

We will normally collect personal information from you only (i) where we need the personal information to perform a contract with you, (ii) where the processing is in our legitimate interests and not overridden by your rights, or (iii) where we have your consent to do so. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If we collect and use your personal information in reliance on our legitimate interests (or those of any third party), this interest will normally be to operate our platform and communicating with you as necessary to provide our services to you and for our legitimate commercial interest, for instance, when responding to

your queries, improving our platform, undertaking marketing, or for the purposes of detecting or preventing illegal activities.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “How to contact us” heading below.

Cookies and similar tracking technology

We use cookies and similar tracking technology (collectively, “Cookies”) to collect and use personal information about you. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Notice.

How do we keep your personal information secure?

We use appropriate technical and organizational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. Specific measures we use include encryption, secure passwords, physical access controls, internal access controls, firewalls, rapid recovery and virus protection.

International data transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different from the laws of your country. Our group companies and third party service providers and partners operate around the world. This means that when we collect your personal information we may process it in any of these countries.

We have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Notice. This includes implementing the European Commission’s Standard Contractual Clauses for transfers of personal information between our group companies.

Data retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal data has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Your data protection rights

If you are a resident of the European Economic Area, you have the following data protection rights:

- Access, correct, update or request deletion of your personal information.
- Object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information.
- You have the right to opt-out of marketing communications we send you at any time.
- If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

To exercise any of these rights, please contact us using the contact details provided under the “How to contact us” heading below. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make and as required by applicable data protection laws.

How to contact us

If you have any questions or concerns about our use of your personal information, please contact us by email: thermoplay@thermoplay.com or mail: Thermoplay S.p.A Via Carlo Viola, 74 - 11026 Pont St. Martin (AO) Italy.

The data controller of your personal information is Thermoplay S.p.A.