

Privacy Notice

Pursuant to Article 13 of the Regulation (EU) 2016/679 containing provisions for the protection of natural persons with regard to the processing of personal data and for the free movement of such data (hereinafter the "GDPR"), we hereby provide you with information regarding the processing of your personal data provided by you through the Netcomm 2025 online contact form (the "Form") through www.fortidia.com (the "Website").

1. Data Controller

Personal Data collected via the Form will be processed by

- Sistema Italia 93 S.r.l. with registered office in Viale Lunigiana 35-37, 20125 Milano, Italia
- MBE Worldwide S.p.A. with registered office in Viale Lunigiana 35-37, 20125 Milano, Italia
- Gel Proximity S.r.l. with registered office in Viale Lunigiana 35-37, 20125 Milano, Italia
- PrestaShop SA with registered office in 198, Avenue de France, 75013 Paris, France

each of them in their quality of independent data controller (hereinafter each the "Controller").

2. Categories of Personal Data processed

The following Personal Data (hereinafter the "Personal Data") provided by you may be processed if you decide to fill in the Form:

- Name, surname, email, telephone number, country, province/state

Moreover, other Personal Data may be processed when reaching the Form:

- IP address
- Browser type and version
- Operating system
- Information collected through cookies, pixel tags, provided by you and without disclosing your specific identity

For more information, you can also look at the [Cookie Policy](#)

3. Purposes and Legal Basis for Processing

Each Controller may process your Personal Data for the following purposes:

- a) to follow up on your contact request and/or any request for information about products and services of the Controller, as requested by you when filling out the Form. The legal basis for this processing is the execution of pre-contractual measures taken at your request. The provision of data is necessary, and without it, the service cannot be provided, i.e., we will not be able to contact you.
- b) to send you, by any means of communication (e-mail, text message, multimedia messaging service, paper-based mail, operator-assisted phone calls), advertising material and literature of

a promotional nature or in any case involving commercial solicitation pertaining to services, products or discounts offered by the Controller, as well as for conducting studies and surveys of the market, and elaborating related statistics. The legal basis of this processing is your consent, which you are free to provide while submitting the Form. You can withdraw your consent at any time. Any refusal to provide the Personal Data for the purposes set out above will have the sole consequence of making it impossible for the Controller to send you advertising and promotional messages, to conduct studies and surveys of the market, and elaborating related statistics;

- c) in the context of any corporate events (sale of the company or business units), due diligence or in the case of defence of a legal claim and the related preliminary activities. The legal basis of this processing is legitimate interests of the Controller in the continuation of its commercial activities and for the protection of its rights.

4. Data Recipient

The Personal Data may be disclosed by the Controller solely and exclusively for the purposes indicated and where necessary, to the following categories of subjects:

- a) agents or collaborators of the Controller who are located within the territory of the European Union;
- b) third parties service providers for IT and marketing activities (e.g., email marketing platforms, CRM systems etc);
- c) consultants for accountancy, administrative, legal, tax and financial matters;
- d) where required, the competent judicial authorities;
- e) where required, public administrations and supervisory and control authorities;
- f) Centers within the MBE franchise network located in Italy (hereinafter “Franchisees”) for the purpose under Section 3 b).

Entities belonging to the categories listed above, may act, as the case may be, as data processors (and in this case they will receive appropriate instructions from the Controller) or as independent data controllers. In such case, the Personal Data will be communicated only with the explicit consent of the data subjects, except where the communication is mandatory or necessary pursuant to the applicable law or for the pursuit of purposes for which the consent from the data subject is not required.

The Controller also has the right to transfer your Personal Data to third countries. Transfers of Data outside the European Economic Area are subject to a special regime pursuant to the GDPR, and are only made in respect of countries that ensure an adequate level of personal data protection, on the basis of an adequacy decision of the Commission or where adequate safeguards have been adopted (including the standard contractual conditions provided by the European Commission), provided that the data subjects have enforceable rights and effective judicial remedies.

5. Retention of Personal Data

Personal Data will be stored, in compliance with the applicable law, for a term not exceeding what is necessary to pursue the purposes for which they are processed.

The criteria for determining the storage period of the Personal Data takes into account the allowed processing period and the applicable laws on the statute of limitation of rights and legitimate interests of the data subject where they are the applicable legal basis for processing.

6. Rights of the data subject

At any time, you will be entitled to:

- i. obtain confirmation from the Controller as to whether your Personal Data is being processed, and where that is the case, to access to the personal information pursuant to art. 15 of the GDPR;
- ii. obtain the rectification of inaccurate Personal Data concerning you, or, taking into account the purpose of the processing, the integration of incomplete Personal Data;
- iii. obtain the erasure of your Personal Data, where one of the grounds under art. 17 of the GDPR applies;
- iv. obtain the restriction of processing of your Personal Data, where one of the cases under art. 18 of the GDPR applies;
- v. object to the processing of your Personal Data on grounds relating to your particular position, where applicable;
- vi. receipt in a structured, commonly used and machine-readable format Personal Data concerning you and provided by you, as well as to transmit those Personal Data to another controller, in the cases and within the limits referred to in art. 20 of the GDPR, where applicable.

You also have the right to withdraw your consent to the processing of your Personal Data (where given) at any time, without prejudice to the lawfulness of the processing based on your consent before its withdrawal. You will have the possibility to opt-out from marketing via email by clicking on the relevant “unsubscribe” link.

According to the GDPR, the Controller may not charge for complying with any of the requests mentioned in this paragraph, unless they are clearly unfounded or excessive and repetitive. Should you request more than one copy of your Personal Data or in cases of excessive or unfounded requests, the Controller may: (i) charge a reasonable expense, considering the administrative costs incurred to fulfil the request; or (ii) refuse to fulfil the request. In these cases the Controller will inform you of the costs before fulfilling the request.

The Controller may ask for further information before fulfilling the requests if it needs to verify the identity of the person who has made them.

Without prejudice to any administrative or legal remedy, you also have the right to lodge a complaint to the relevant supervisory Authority (for Italy: the “Garante per la protezione dei dati personali” and for France: the “CNIL- Commission nationale de l’informatique et des libertés”), if you believe that processing of your data is in breach of the GDPR. More information is available on the website https://www.garanteprivacy.it/en/home_en and <https://www.cnil.fr/en>.

In any case, the Controller is interested in knowing the reasons for the complaint and requests that you

use the above contact methods before turning to the authorities, in order to prevent and resolve any disputes, amicably and promptly, with the greatest courtesy, professionalism and discretion.

For more information about the provisions contained in Articles from 15 to 22 of the GDPR, click on the following link: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679>

7. Contacts for the exercise of the rights of the data subject and for further information

With respect to the exercise of your rights in relation to the purposes as per Section 3 above and/or to obtain any type of information you may need in relation to the Controller pursuant to this privacy notice, you can send a written communication to

- **Sistema Italia 93 S.r.l.** Viale Lunigiana 35-37, Milano, Italia privacy@mbeglobal.com
- **MBE Worldwide S.p.A.** Viale Lunigiana 35-37, Milano, Italia privacy@mbeglobal.com
- **GEL Proximity S.r.l.** - Viale Lunigiana, 35/37, 20125 Milano, Italia info@gelproximity.com
- **Prestashop SA** - 198, Avenue de France, 75013 Paris, France privacy@prestashop.com

8. Changes to this privacy notice

This privacy notice will be valid as of the date indicated below. It is advisable to regularly monitor this privacy notice by visiting the Website in order to keep up to date with any future changes.

☐ Confirm to have read and accepted the **Privacy Notice**;

☐ consent / ☐ do not consent

to the processing of my personal data for the purpose of marketing by Sistema Italia 93 S.r.l. as per Section 3. b) of the Privacy Notice;

☐ consent / ☐ do not consent

to the processing of my personal data for the purpose of marketing by Gel Proximity S.r.l. as per Section 3. B) of the Privacy Notice;

☐ consent / ☐ do not consent

to the processing of my personal data for the purpose of marketing by PrestaShop SA as per Section 3. B) of the Privacy Notice;

☐ consent/ ☐ do not consent

to the processing of my personal data for the purpose of marketing by the MBE Franchisees as per Section 4 f) of the Privacy Notice;