PRIVACY POLICY

Dear Customer,
Pursuant to Article 13 of Regulation (EU) No. 2016/679 (hereinafter, the "GDPR") and Article 13 of Legislative Decree No. 196/2003, containing the "Personal Data Protection Code" (hereinafter, the "Code"), we hereby inform you that your personal data and/or the personal data of individuals acting in your name and/or on your behalf – including, by way of example, shareholders, directors, legal representatives, employees and/or collaborators – collected in connection with the establishment and management of B2B contractual relationships with **Cicli Pinarello S.r.l.**, as Data Controller (hereinafter, the "Data Controller"), pursuant to Articles 4–24 of the GDPR, will be processed as follows.

1. Data Controller
The Data Controller is **Cicli Pinarello S.r.l.**, with registered office in Villorba (TV), Viale della Repubblica 12, Tax Code and VAT No. 05994100963, certified email (PEC): pinarello.cicli@legalmail.it, e-mail: privacy@pinarello.com.

2. Categories of Personal Data Processed
The Data Controller may process the following categories of personal data:

- **identification and contact data** (e.g. first name, surname, company role, business e-mail address, telephone number, contact language);
- **data relating to the represented company** (e.g. company name and other data, including tax, invoicing and payment information);
- **purchase data** (e.g. order history).

The Data Controller does not, in any event, process special categories of personal data pursuant to Article 9 of the GDPR.

3. Purposes and Legal Basis of Processing
Personal data are processed by the Data Controller for the following purposes:

1. **management of the contractual and administrative relationship and information requests:** including management of the initial commercial contact (at trade fairs, through agents, door-to-door or by completing an *online form*), responding to information requests, sending informational material and product catalogues/price lists, performance of the contract (order management, shipping, invoicing, warranties, customer service and after-sales assistance), and creation and management of the restricted account on the "Dealer" portal;
2. **direct marketing:** including the sending of commercial communications, promotions and invitations to events, also through systems that measure the audience and

performance of communications (meaning the opening or reading of the communication sent);

3. **in any event, the exercise of the Data Controller's rights** (e.g. the right to defend itself in legal proceedings).

The legal basis for the processing of personal data is identified as follows:

- for the purposes referred to in point **1)**, performance of the contract and pre-contractual measures pursuant to Article 6(1)(b) of the GDPR, as well as compliance with legal obligations pursuant to Article 6(1)(c) of the GDPR;
- for the purposes referred to in point **2)**, your freely given, specific, informed and revocable consent pursuant to Article 6(1)(a) of the GDPR;
- for the purposes referred to in point **3)**, the legitimate interest of the Data Controller pursuant to Article 6(1)(f) of the GDPR.

4. Methods of Processing

The initial collection of data takes place (i) upon the first commercial contact and/or (ii) following the signing of the contract. The data will be processed using manual, paper-based, electronic, computerised and telematic means, stored on information systems (including CRM and ERP systems and contact and marketing management platforms), as well as on any other suitable medium, in compliance with security and confidentiality measures in accordance with the so-called *data protection by design* and *by default* principles, i.e. the application of measures designed to minimise the risks of data loss, unauthorised access and disclosure.

The processing of your data is carried out through the operations indicated in Article 4(2) of the GDPR, namely: collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or any other form of making available, comparison or interconnection, restriction, erasure or destruction.

The Data Controller does not use fully automated decision-making processes that produce legal effects or similarly significantly affect you within the meaning of Article 22 of the GDPR. The profiling activities described in this privacy notice are carried out exclusively for the purpose of personalising offers and commercial communications.

5. Data Retention Period

Personal data will be retained for the period strictly necessary to achieve the purposes for which they were collected and, in particular:

- data processed for the purpose of **managing the contractual and administrative relationship** will be retained for 10 years from the date of purchase; data processed for the management of commercial contacts and information requests, where no contractual relationship follows their collection, will be retained for a period of 24 months from collection;

- data relating to the **restricted account** will be retained for the entire duration of the commercial relationship and, in any event, the account will be deactivated after 36 months of inactivity (i.e. failure to access the restricted account);
- data processed for **marketing** purposes will be retained until consent is withdrawn and, in any event, will be automatically deleted after 36 months of inactivity (including failure to access the restricted account and/or failure to interact with communications received from the Data Controller).

Once these periods have expired, the data will be deleted or anonymised, unless further retention is required by law or for the exercise or defence of a right in judicial proceedings.

6. Nature of the Provision of Data and Consequences of Refusal

The provision of data for the purposes of managing the commercial and administrative relationship and information requests is necessary. Any refusal to provide such data, in whole or in part, may make it impossible for the Data Controller to establish and properly perform the commercial relationship and the related administrative and tax obligations, as well as to provide customer service and after-sales assistance.

The provision of data for marketing purposes is, on the other hand, optional and subject to your consent. Failure to provide such data or withdrawal of consent will in no way affect the purchase or use of ancillary services, but will merely result in the inability to receive personalised promotional communications and/or dedicated offers.

7. Categories of Recipients of Personal Data

Solely for the purposes specified above, the data collected may be disclosed to internal persons formally authorised to process data by virtue of their respective duties, as well as to the following categories of external recipients:

- service providers of the Data Controller, e.g. for maintenance activities (such as IT service providers), operational and logistical requirements (such as shipping), and event organisation and marketing (such as *digital marketing* services);
- agents and/or collaborators of the Data Controller;
- companies belonging to the same group;
- consultants, professionals and service companies (e.g. accountants and law firms) acting on behalf of the Data Controller, as well as public authorities and bodies where required by law.

Where such recipients process data on behalf of the Data Controller, they will be appointed as external data processors pursuant to Article 28 of the GDPR, by means of a specific agreement or other legal act. The updated list of appointed external data processors will be provided upon request by the data subject.

8. Transfer of Data to a Third Country and/or an International Organisation

Personal data will not be disseminated. Without prejudice to disclosures made in compliance with legal and contractual obligations, all data collected and processed may be disclosed in Italy and, in any event, within the European Union, exclusively for the purposes specified above.
Where the use of certain service providers entails the transfer of data to third countries (e.g. due to the use of foreign IT platforms), the Data Controller shall ensure that appropriate safeguards are adopted pursuant to Articles 44 et seq. of the GDPR.

9. Rights of the Data Subject

We hereby inform you that you may exercise the rights recognised by Articles 15 to 21 and 77 of the GDPR and, in particular:

1. **right of access:** the right to obtain confirmation from the Data Controller as to whether or not personal data concerning you are being processed and, where this is the case, to obtain access to such data;
2. **right to rectification and erasure:** the right to obtain the rectification of inaccurate data and/or the completion of incomplete data, or the erasure of data on legitimate grounds;
3. **right to restriction of processing:** the right to request the suspension of processing where legitimate grounds exist;
4. **right to data portability:** the right to receive data in a structured, commonly used and machine-readable format, as well as the right to transmit such data to another data controller;
5. **right to withdraw consent:** the right to withdraw consent at any time without affecting the lawfulness of processing based on consent given prior to its withdrawal;
6. **right to object:** the right to object to the processing of data where legitimate grounds exist, or, where applicable, to object to processing for marketing purposes;
7. **right to lodge a complaint with the competent data protection authority** in the event of unlawful processing.

Requests concerning the above rights may be submitted to the Data Controller using the following contact details: *(i)* by registered mail, to Cicli Pinarello S.r.l., with registered office in Villorba (TV), Viale della Repubblica No. 12; *(ii)* by e-mail, to privacy@pinarello.com.
Should the purpose or methods of processing personal data undergo any significant changes, we will promptly update this privacy notice and appropriately inform you of the changes.

Villorba (TV), 01/09/2026

The Data Controller
Cicli Pinarello S.r.l.