

# Privacy Policy of unionezero.com

Welcome to the privacy policy of unionezero.com. This policy will help you understand what data we collect, why we collect it, and what your rights are in relation to it.

## Owner and Data Controller

PRELIOS Società di Gestione del Risparmio S.p.A.

Via Valtellina 15/17  
20159 Milano

**Owner contact email:** [sg@preliosgr.com](mailto:sg@preliosgr.com)

## Type of Data we collect

Among the Personal Data collected by unionezero.com are:

- First name
- Last name
- Phone number
- Email address
- **Usage Data:** The computer systems and software procedures used to operate this Website acquire, during their normal operation, some Personal Data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified individuals, but by its very nature could, through processing and association with data held by third parties, allow Users to be identified. This category of data includes the IP addresses or domain names of the computers used by Users who connect to the Website, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's response (successful, error, etc.), and other parameters related to the User's operating system and IT environment.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this Privacy Policy or through specific information notices displayed before the Data is collected.

Personal Data may be freely provided by the User or, in the case of Usage Data, collected automatically while using unionezero.com.

Unless otherwise specified, all Data requested by unionezero.com is mandatory. If the User refuses to provide such Data, it may be impossible for unionezero.com to provide the requested Service. In cases where unionezero.com specifically states that certain Data is optional, Users are free to withhold such Data without affecting the availability or functioning of the Service.

## **Mode and place of processing the Data**

### **Methods of processing**

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated.

### **Processing of Personal Data by Third Parties**

We may disclose Personal Data for the purposes outlined in this Privacy Policy to the following categories of recipients:

- (i) collaborators and employees of the Data Controller and of the entities listed below in this Section 6, within the scope of their respective duties, as persons authorized to process the Data;
- (ii) third-party service providers offering support and consulting services in areas such as, by way of example, marketing, technology, accounting, administration, legal matters, and insurance — acting as Data Processors or independent Data Controllers;
- (iii) entities and authorities whose right to access the Data is expressly recognized by law, regulation, or measures issued by competent authorities — acting as independent Data Controllers.

Furthermore, with regard to Identifying Data, the Controller may also disclose such Data to the following categories of recipients:

- (iv) parties acquiring the business or business units, and companies resulting from potential mergers, demergers, or other corporate transformations of the Controller — acting as independent Data Controllers.

An up-to-date list of Data Processors can be requested at any time from the Data Controller.

Personal Data will not be disseminated.

## **The purposes of processing**

User Data is collected for the following purposes:

- To allow the Controller to provide the Service and for the User to browse the website, as well as to respond to any requests from the User related to the services offered by the Controller (“**Contractual Purposes**”);
- To comply with applicable laws and regulations (“**Legal Purposes**”);
- With the prior consent of the User, to carry out market research and send newsletters, commercial communications, and event invitations through traditional and remote means of communication, including email, SMS, social networks, instant messaging, mobile applications, banners, post, and telephone, for the promotion and/or sale of products and/or services offered by the Controller (“**Marketing Purposes**”);
- With the prior consent of the User, to send commercial communications and event invitations (through the means indicated in the previous point) that are tailored to the User's preferences, interests, characteristics, and consumption habits, or to perform analyses based on such characteristics, including combining Identifying Data with other personal data lawfully held by the Controller (“**Profiling Purposes**”);
- With the prior consent of the User, to send marketing communications from **Hines Italy RE Srl**, related to services similar to those offered on the Website, through the communication methods described above (“**Third-Party Marketing Purposes**”);
- To carry out activities related to business transfers or sales of business units, acquisitions, mergers, demergers, or other corporate transformations, and to manage the execution of such operations, as well as to assert and defend the rights of the Controller against the User or third parties in the event of a dispute (“**Legitimate Interest Purposes**”).
- Tag Management

## Tag Management

This type of services enables the Data Controller to manage tags or scripts required on [unionezero.com](https://unionezero.com) in a centralized manner. As a result, User Data may be processed by these services and may also be stored.

## Cookie Policy

Unionezero.com uses Trackers as well as cookies and other similar technologies (e.g., widgets). To learn more, Users may consult the Cookie Policy.

## **Further Information for Users in the European Union**

### **Legal basis of processing**

Data Processing for Contractual Purposes is necessary in order to benefit from the features provided through the Website. Therefore, if the User does not wish for their Data to be processed for this purpose, it will not be possible to use the services offered on the Website and/or respond to any requests made.

Data processing for Legal Purposes is mandatory, as it is required by applicable laws.

Data processing for Marketing Purposes and Third-Party Marketing Purposes is optional and subject to the prior consent of the User. Failure to provide consent will make it impossible for the Controller and/or Hines Italy RE Srl to keep the User informed about new products or services, promotions, or other updates that may align with the User's interests.

Data processing for Legitimate Business Interest Purposes serves the Controller's legitimate interest, which has been balanced against the interests of Users in accordance with the restrictions applicable to such processing and is not mandatory. The User has the right to object to such processing as indicated in this Privacy Policy, unless the Controller has a prevailing interest in continuing the processing or the processing is necessary for the establishment or defense of legal claims.

## **Further Information on Retention Periods**

Personal Data are processed and stored for the time required to fulfill the purpose for which they were collected.

Accordingly:

- Personal Data collected for Contractual Purposes will be retained until the execution of the contract and/or the requested service is completed.
- Personal Data collected for Legal Purposes will be retained for the period required by the applicable law for each type of data.
- Personal Data collected for the Controller's Legitimate Business Interest will be retained for the time needed to carry out the relevant corporate operations, and the same retention periods as the related primary processing activity will apply.

- Personal Data processed for Marketing Purposes and Third-Party Marketing Purposes will be stored for 24 months from the date of consent, without prejudice to the User's right to object at any time.

At the end of the retention period, Personal Data will be deleted and/or anonymized.

## User Rights

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

### Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for

direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

### **How to exercise these rights**

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

### **Specific Information**

At the User's request, in addition to the information contained in this privacy policy, unionezero.com may provide the User with additional and contextual information concerning specific Services, or the collection and processing of Personal Data.

### **Changes to this Privacy Policy**

The Data Controller reserves the right to make changes to this privacy policy at any time by notifying Users on this page and, if possible, on unionezero.com as well as, where technically and legally feasible, by sending a notification to Users via one of the contact methods available to the Controller.

Therefore, please consult this page regularly, referring to the date of the last modification indicated at the bottom.

If the changes affect processing activities whose legal basis is consent, the Controller will collect the User's consent again, if necessary.