



Social Media Notice

Information on the use of our Fan Pages and on the processing of personal data

Introduction

We thank you for joining our communities. SEIPEE S.p.A. (hereinafter "Company") draws your attention to the risks that may arise from posting personal data, photos, videos, images and/or comments within the Fan Pages.

Please take a few moments to read our Social Media Policy, which must be observed when you interact with our Fan Pages.

When you interact with our accounts on social networks, via web or app, we and the providers of the social media platform technology collect information and personal data concerning you. For this reason, in accordance with Articles 13 and 14 of Regulation (EU) 2016/679 (hereinafter "GDPR"), we have prepared this document in order to describe which personal data we collect, the purposes and methods of their processing and the security measures we adopt to protect them.

This Social Media Policy constitutes the information notice provided to data subjects pursuant to the applicable data protection legislation and applies exclusively to the following Fan Pages:

- Facebook:
<https://www.facebook.com/seipeemotorielettrici>
- LinkedIn: https://www.linkedin.com/legal/user-agreement?_l=it_IT

Purposes of the processing and nature of provision

The processing aims to ensure new channels of information, communication and dialogue with users, with modes of interaction and participation, in order to enhance communication means

and to strengthen a relationship with you. We process your personal data solely for the management of our Fan Pages, to respond to any requests and to verify that your messages and/or posts on the page comply with the provisions of this Social Media Policy. Providing your personal data is optional and, in the absence of such provision, you will not be able to view the content of our Fan Pages nor interact with them. When you decide to follow our Fan Pages, and can therefore interact with them and receive our updates directly on your homepage, you provide us with the personal data associated with your social network account. If you do not wish to provide your personal data to us, we invite you to stop or to refrain from following our Fan Pages.

Methods of data processing and data retention

The "**Company**" processes your personal data by electronic means and through the tools provided by the companies supplying the social media platform technology that host our Fan Pages, in compliance with the security requirements required by applicable law. Our security measures include contractual instruments with third-party processors in order to ensure the protection of the security and confidentiality of your personal data in accordance with the provisions of applicable data protection legislation.

We retain your personal data for the entire period during which you follow our Fan Pages. Even after you have chosen to no longer follow our Fan Pages, we will process your data in relation to your activity and your interactions with our Fan Pages that occurred prior to that date, in accordance with the policies of the social networks hosting our Fan Pages. We will also retain your data to the extent necessary to comply with obligations imposed by laws or regulations, to protect our rights, to prevent fraud or to enforce this Social Media Policy.

Scope of communication

Your collected data may be disclosed by us only to the web agency appointed to manage the same. It should be noted that by using communication systems and digital platforms not owned by the "Company", you also communicate your data to the owners of such systems and platforms, who are joint controllers of the processing.

Your data processed by the "Company" are accessible to our duly authorized personnel (e.g., staff responsible for managing the social pages) on the basis of necessity criteria.

Scope of disclosure

Your personal data will not be disseminated by us. For more information we invite you to consult the Privacy Policy of the Social Pages.

Transfer of data abroad

Your personal data will not be transferred by the "Company" outside the European Union or to countries that do not ensure an adequate level of data protection.

With regard to the data processed by the companies that supply the social media platform technology, we invite you to consult the following:

- Facebook: <https://www.facebook.com/terms.php>
- LinkedIn: https://www.linkedin.com/legal/user-agreement?_l=it_IT

Rights of the data subject

The "**Company**" requires that the joint controllers be established within the EU and accepts that they may take and implement decisions regarding the processing of Statistical Data. Any disputes will be handled under jurisdiction in Italy.

In the event that the "Company" is contacted by data subjects or by the Supervisory Authority regarding processing carried out on the social pages, it must promptly inform the joint controller.

The data subject may at any time request from Seipee S.p.A. access to personal data, rectification, deletion or restriction of the processing of personal data or object to their processing, as well as the right to data portability. The methods for exercising the rights referred to in Articles 15 to 21 of the GDPR are published on the Company's institutional website or can be requested in writing by contacting the Company's institutional address.

Withdrawal of consent: the data subject may withdraw consent to the processing of his/her data at any time without affecting the lawfulness of processing based on consent before its withdrawal. Withdrawal of consent in respect of data necessary for the provision of services will result in the termination of such services. The data subject may lodge a complaint with a Supervisory Authority.

Joint controllers and Data Protection Officers

The joint controllers of personal data are:

The companies supplying the social media platform technology.

- For Facebook and Instagram, Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland;
- For LinkedIn, LinkedIn Ireland Unlimited Company Attn: Legal Dept. (Privacy Notice and License Agreement) Wilton Plaza Wilton Place, Dublin 2, Ireland;

Company that administers the social page

- Seipee S.p.A., Viottolo Croce 1 - 41011, Campogalliano (MO), tel. +39 059 850108, privacy@seipee.it.

The Data Protection Officers pursuant to art. 37 of the GDPR are:

For the companies supplying the social media platform technology, the references are indicated on their respective institutional websites.

SOCIAL MEDIA POLICY

The Social Media Policy is the formally adopted code of conduct that governs the relationship on the internet, and in particular on social media, between the Company and its users (External Social Media Policy).

The Company's social channels are managed by staff responsible for managing the social pages and by the web agency.

The Company reserves the right to create Pages or Groups dedicated to the promotion of specific projects, identifiable by the page title itself, by specifically authorized persons.

Users' comments and posts, who are invited to always identify themselves with their full name, represent the opinions of the individuals and not those of the Company, which cannot be held responsible for what is posted on its channels by third parties.

Moderation

The Company's social media channels are normally moderated during office hours.

Please engage in polite, relevant and respectful conversation: on the Company's social channels everyone may take part to express their free opinion, always following the good rules of courtesy and respect for others.

Comments and posts that violate the conditions set out in this document will be moderated, including preventively, and will be promptly removed.

Insults, coarse language, threats or behaviors that undermine the dignity of persons and the decorum of Institutions, the rights of minorities and minors, the principles of freedom and equality will not be tolerated, and in particular:

- content that promotes, favors or perpetuates discrimination on the basis of sex, race, language, religion, political opinions, beliefs, age, marital status, entitlement to public assistance, nationality, physical or mental disability or sexual orientation
- sexual content or links to sexual content
- solicitations for commercial purposes
- conduct or encouragement of unlawful activities
- information that may tend to compromise public safety
- content that infringes the rights of a legal owner or third parties
- comments or posts that disclose special categories of personal data (so-called sensitive data) in violation of the privacy law.

Comments and content of the following types are also discouraged and in any case subject to moderation:

- comments not relevant to the specific topic published (off topic)
- observations for or against political campaigns or indications on how to vote
- offensive language or content
- comments and posts written to disrupt the discussion or to offend those who manage and moderate the social channels
- spam
- repeatedly posted interventions.

The Company reserves the right to remove any content deemed to be in violation of this social media policy or any applicable law.

For those who violate these conditions or those contained in the policies of the tools adopted, we reserve the right to use bans or blocks to prevent further interventions and, where appropriate, to report the user to the competent law enforcement authorities.

Privacy

Please note that the processing of users' personal data complies with the policies in force on the platforms used (Facebook, Instagram and LinkedIn). Please be aware that sensitive data posted in public comments or posts within the Company's social channels will be removed (see Moderation section). Data shared by users through private messages sent directly to the Company's channels will be processed in accordance with Italian and European privacy laws.

To contact the editorial team of the Company's social channels send an email to the institutional email address.

Below are the policies for each social media used by the Company, to clarify what type of content is conveyed, who produces it and how the online conversation is managed.

Facebook Policy

The Company has an institutional profile on Facebook.

<https://www.facebook.com/seipeemotorielettrici>

Those who follow the Company are not automatically followed in return.

An analysis is carried out of the users who "like" the page and of the users who "register", with the aim of better identifying the recipients of the messages and adopting appropriate communication methods and content.

Users may post texts, photos or videos on their own Facebook profile referencing the Company.

Users are free to share the Company's posts on their own profiles.

Comments, suggestions and ideas from visitors are appreciated. A direct response is not guaranteed but, where the editorial staff deems the topic useful and the communicative style appropriate, the Company's editorial team takes part in the conversation and replies to comments.

LinkedIn Policy

LinkedIn is a social network designed for the world of work. It is an excellent tool for very specific or highly qualified professional figures who want to expand their network of contacts or be found by potential recruiters. LinkedIn is also a relevant communication medium for companies, which can achieve great visibility and reach many users interested in a specific sector.

The Company has an institutional profile on LinkedIn

<https://www.linkedin.com/company/seipee-spa/>

The purposes of the page are multiple: to be found by industry experts and potential customers, to link the page to employees' professional profiles, to present its products and services.

Those who follow the Company are not automatically followed in return.

However, periodic surveys are carried out on users with the aim of identifying the recipients of the messages and adopting appropriate communication methods and content.

Users may post texts, photos or videos on their own LinkedIn profile referencing the Company.

Users are free to share the Company's posts on their own profiles.

Comments, proposals and ideas from visitors are appreciated. A direct response is not guaranteed but, where the editorial staff deems the topic useful and the communicative style appropriate, the Company's editorial team takes part in the conversation and replies to comments.

Extract of Reg. (EU) 2016/679: Arts. 15, 16, 17, 18, 19, 20, 21, 22 – Rights of the Data Subject

1

The data subject has the right to obtain confirmation as to whether or not personal data concerning him or her are being processed, even if not yet recorded, and to have such data communicated in an intelligible form and the possibility to make a complaint to the Supervisory Authority.

2

The data subject has the right to obtain the indication of:

1. the origin of the personal data;
2. the purposes and methods of the processing;
3. the logic applied in the event of processing carried out with the aid of electronic instruments;
4. the identification details of the controller, processors and the representative designated pursuant to Article 5, paragraph 2;
5. the persons or categories of persons to whom the personal data may be communicated or who may become aware of them in their capacity as designated representative in the territory of the State, processors or personnel authorized to process personal data.

3

The data subject has the right to obtain:

1. the updating, rectification or, when he or she has an interest, the integration of the data;
2. the deletion, anonymization or blocking of data processed in violation of the law, including data that do not need to be retained in relation to the purposes for which the data were collected or subsequently processed;
3. certification that the operations referred to in letters a) and b) have been brought to the attention, also regarding their content, of those to whom the data have been communicated or disseminated, except where such compliance proves impossible or involves the use of means manifestly disproportionate to the protected right;
4. the portability of the data.

4

The data subject has the right to object, in whole or in part:

1. for legitimate reasons to the processing of personal data concerning him or her, even if relevant to the purpose of the collection;
2. to the processing of personal data concerning him or her for the purposes of sending advertising material or direct sales or for carrying out market research or commercial communication.