

Privacy Policy for Users

This Privacy Policy is intended to provide all information on the processing of personal data carried out by Unleadmitted SRL when the user signs up for a prize competition available on this site.

1. INTRODUCTION - ABOUT US

Unleadmitted SRL with registered office in Pedara (CT) - Via Empedocle 28, VAT no. 05774020878 (hereinafter, "**Data Controller**"), owner of the website selected-winners.co.uk (hereinafter, the "**Website**"), as the data controller of the personal data of users who browse and subscribe to the initiative accessible through the Website (hereinafter, "**Users**") provides below the Privacy Policy pursuant to art. 13 of EU Regulation 2016/679 and the UK General Data Protection Regulation (hereinafter, respectively, the "**Regulation**" and the "**UK GDPR**" and, jointly, the "**Applicable Regulation**"). Unleadmitted SRL is registered with the UK Information Commissioner's Office under registration number A9024022.

2. HOW TO CONTACT US?

The Data Controller takes the utmost account of Users' right to privacy and personal data protection. For any information related to this Privacy Policy, Users **can contact the Data Controller** at any time, via any of the following means:

- By **sending a registered letter with return receipt** to the registered office of the Data Controller: Via Empedocle 28/a 95030 Pedara (CT);
- By **sending an e-mail** to: info@unleadmittedsrl.com.

The Data Controller has identified a Data Protection Officer (RPD or DPO), pursuant to Article 37 of the Regulation: the DPO is Shibumi S.r.l., with Lapo Curini Galletti as its designated person (DPO appointment declared to the lead supervisory authority for the Controller, which is the Italian "Garante per la protezione dei dati personali").

The Users can contact the DPO at the e-mail: dpo@conversionmediaadv.com

3. WHAT DO WE DO? - PURPOSE OF THE PROCESSING

Users' personal data will be processed lawfully by the Data Controller pursuant to Article 6 of the Regulation for the following processing purposes:

- a) **participation in the prize competition**, to allow the Website navigation or to execute the rules of the prize event, accepted by the User during registration and to fulfil specific requests of the User. The User's data collected by the Data Controller for the purposes of participation include: gender, name, surname, date of birth, residential address, email address and telephone number. Unless the User gives the Data Controller a specific and optional consent to the processing of their data for the additional purposes set out in the following paragraphs, the User's personal data will be used by the Data Controller for the exclusive purpose of ascertaining the identity of the User (also by validating the email address), thus avoiding possible scams or abuses, and contacting the User for service reasons only (e.g. managing the User's participation in the prize event, notifying any winnings and managing the phase of awarding and delivery of prizes; contact the User to obtain additional data and information - such as a copy of the identity card - possibly requested by the notary and the chamber official responsible for the prize competitions; make any urgent communications by telephone during the collection and use of prizes). Without prejudice

to the other provisions contained within this Privacy Policy, the Data Controller will not make Users' personal data accessible to other Users and/or third parties under any circumstances.

- b) **administrative/accounting purposes**, i.e., activities of an organisational, administrative, financial and accounting nature such as internal organisational activities and functional tasks necessary for the fulfilment of contractual and pre-contractual obligations;
- c) **legal obligations**, or to fulfil obligations established by law, by an authority, by a regulation or by European legislation (by way of example, legislation on tax matters; legislation on prize events - Presidential Decree 430/2001).

The provision of personal data for the processing purposes indicated above is optional but necessary, as failure to provide them will make it impossible for the User to register on the Website and take advantage of the services offered by the Data Controller on the Website.

The personal data necessary to fulfil the purposes of the processing operations described in this paragraph 3 are indicated with an asterisk in the Website registration form.

4. FURTHER PURPOSES OF PROCESSING

4.1 Marketing

With the **free and optional consent** of the User, some of the User's personal data (i.e. name, surname, email address and telephone number) may also be processed by the Data Controller for marketing purposes (sending advertising material, direct sales, commercial communication), or so that the Data Controller can contact the User by mail, email, telephone (landline and/or mobile, with automated call or call communication systems with and/or without the intervention of an operator) and/or SMS and/or online messaging services (WhatsApp, Telegram, WeChat) to propose to the User the purchase of products and/or services offered by the same Data Controller and/or third-party companies, to present offers, promotions and commercial opportunities.

In case of lack of consent, the possibility of registering for the competition will not be affected in any way.

In case of consent, the User may at any time revoke the same making a request to the Data Controller in the manner and via the channels indicated in the following paragraph 8.

The User can also easily oppose further sending of promotional communications via email also by clicking on the appropriate link for the withdrawal of consent, which is present in each promotional email. Once the consent has been revoked, the Data Controller will send a notification to the User to confirm that the consent has been revoked. If the User intends to withdraw his consent to the sending of promotional communications by telephone, while continuing to receive promotional communications via email, or vice versa, please send a request to the Data Controller in the manner and via the channels indicated in the following paragraph 8.

The Data Controller declares that following exercise of the right to object to receipt of advertising by email, it is possible that, for technical and operational reasons (e.g., formation of contact lists already completed shortly before the Data Controller's receipt of the objection) the User continues to receive

some additional promotional messages. Should the User continue to receive promotional messages 24 hours after exercising the right to object, please report the problem to the Data Controller, using the contacts details indicated in the following paragraph 8.

4.2 Communication of data to third-party companies

With the **free and optional consent** of the User, the User's personal data (i.e., name, surname, gender, address, email address, telephone) will be communicated by the Data Controller to the following categories of third-party companies:

- (i) landline and mobile telephone companies;
- (ii) companies which operate in the publishing world (printed, internet, television and new media);
- (iii) companies which operate in the field of e-commerce of products and services;
- (iv) companies operating in the energy sector;
- (v) companies operating in the travel and leisure sector;
- (vi) companies that deal with professional and/or school training;
- (vii) advertising agencies, media and contact centres;
- (viii) companies operating in the food sector;
- (ix) NGOs and ONLUS;
- (x) companies operating in the financial and insurance sector;
- (xi) companies operating in repair of household appliances
- (xii) companies operating in the marketing and web communication sector, as well as their commercial partners, belonging to the e-commerce, mail order, publishing, utilities, tourism, sports, communication, entertainment, financial, insurance, automotive, large sectors consumption, for sending advertising material and other promotional and commercial purposes, by post or telephone and/or automated call systems or call communication without the intervention of an operator and/or electronic communications such as email, fax, messages like MMS or SMS or other types.
- (xiii) companies operating as Marketing Services Providers who will use it for a variety of direct marketing, testing, research & product development purposes. Marketing Services Providers may use Users' data to create models useful to predict behaviour and preferences (e.g. how likely you are to buy a holiday online or take a particular type of holiday) or likely circumstances (e.g. whether you are eligible for a particular credit card);
- (xiv) companies providing repair services for household white goods and similar appliances.

These categories above include companies that have asked to be explicitly indicated within the extended list (hereinafter, the "**Extended List**") of third party companies, customers and/or commercial partners and/or sponsors of the Data Controller (hereinafter, "**Third-Party Companies**"): to view the Extended List, click on the following link [https://selected-winners.co.uk/Third-Party Companies](https://selected-winners.co.uk/Third-Party-Companies), as independent data controllers, will process the User's personal data for their own marketing purposes (direct sales, sending advertising material and commercial communication), and will be able to contact them by mail, email, telephone (landline and/or mobile, with automated call or call communication systems with and/or without the intervention of an operator) and/or SMS and/or online messaging services (WhatsApp, Telegram, WeChat) to offer the User the purchase of products and/or services offered by the same categories of third-party companies and/or other companies they provide their services for and present offers, promotions and commercial opportunities to the User. Once the transfer has taken place, and except in the case

in which the policy of each Third Company is accessible from this text and/or from the Extended List, it will be the responsibility of the Data Controller's business partner to provide Users with all the information required by the Applicable Regulation.

In case of lack of consent, the possibility of registering on the Website will not be affected in any way.

In case of consent, the User may at any time revoke the same making a request to the Data Controller in the manner and via the channels indicated in the following paragraph 8.

The Data Controller informs that User's personal data will be processed by the Third-Party Companies as independent data controllers, based on the specific policy that will be issued by the Third-Party Companies to the Users. Any requests not to receive further commercial communications from Third-Party Companies, to which the data have already been communicated by the Data Controller, must therefore be addressed directly to them.

5 LEGAL BASIS

Participation in the competition (as described in the previous par. 3, lett. a)): the processing is necessary for the execution of a contract and/or the execution of pre-contractual measures adopted at the request of the User.

Administrative-accounting purposes (as described in the previous paragraph 3, lett. b)): the processing is necessary for the execution of a contract and/or for the execution of pre-contractual measures adopted at the request of the User.

Legal obligations (as described in the previous paragraph 3, lett. c)): the processing is necessary to fulfil a legal obligation to which the Data Controller is subject.

Further processing purposes: for marketing activities (as described in the previous paragraph 4.1) and for communication of data to Third Party Companies for their marketing purposes (as described in the previous paragraph 4.2), the legal basis is constituted by the provision by the data subjects of a consent to the processing of personal data for one or more specific purposes. For this reason, the Data Controller asks the User to provide a specific, free and optional consent to pursue each of these processing purposes.

Please notice that the Third-Party Companies may rely on different legal basis in order to undertake further processing activities, such as their Legitimate Interest, as better specified in their privacy policies, provided for in the Extended List available at <https://selected-winners.co.uk/> .

In case data shall be processed by said parties in pursuance of legitimate interests, it may include using such data for postal and telephone marketing - for said Third-Party Companies or others - but in either case communication shall be in relation to products or services which the Third Parties believe may be of interest to the Users based upon information which the Users have provided. As with all Users' data, the Users can also object to Third-Party Companies processing their data in this way.

6 PROCESSING METHODS AND DATA RETENTION TIMES

Users' personal data will be processed by the Data Controller using manual and IT tools, as strictly necessary to achieve the purpose for which they are processed, and in any event, to ensure

confidentiality of the data. The personal data of the Users of the Website will be kept for the time strictly necessary to carry out the primary purposes connected to the User's participation in the competition (illustrated in paragraph 3 above) and in any case for the time necessary for the civil protection of both User's and the Data Controller's interests (therefore, indicatively, between 5 and 10 years).

In the cases referred to in paragraphs 4.1 and 4.2 above, Users' personal data will be kept by the Data Controller for as long as the User continues to carry out actions (we consider "actions" and "activities", by way of example and not exhaustive, any access to the portal, interaction with communications sent by the Data Controller and/or Third-Party Companies, access to any service or content of the Platform) and, in any case, up to the withdrawal of consent. If the User does not carry out any activity for a period of 36 months, the Data Controller will proceed with the cancellation of personal data.

The data retention period by Third-Party Companies can be found by the User in the information provided by them pursuant to the Applicable Regulation.

7 SCOPE OF DISCLOSURE AND DISSEMINATION OF DATA

The User's personal data may be transferred outside the United Kingdom but, at the moment, only towards European Economic Area's (EEA) countries. The Applicable Regulation permits the transfer of personal data from United Kingdom to the EEA and to any countries which, as at 31 December 2020, were covered by a European Commission 'adequacy decision' (this is to be kept under review by the UK Government).

Users' personal data may be disclosed to the employees and/or collaborators of the Data Controller in charge of managing the Website. These subjects, who are formally appointed by the Data Controller as "data processors", will process the User's data exclusively for the purposes indicated in this policy and in compliance with the provisions of the Applicable Regulation.

Third parties who may process personal data on behalf of the Data Controller as **Data Processors** may also become aware of the Users' personal data, such as, for example:

- service providers (such as administrative, IT, mailing services, credit recovery companies, etc.);
- consultants (such as accountants, auditing firms, lawyers, etc.);
- companies of the same group, associated companies.

Users have the right to obtain a list of any data processors appointed by the Data Controller, by making a request to the Data Controller in the manner indicated in paragraph 8 below.

Furthermore, the personal data of the Users may be communicated by the Data Controller, as well as to the Third-Party Companies referred to in paragraph 4.2 (in case of consent), to other third parties, independent data controllers, to the extent that this is necessary to execute the competition regulations and/or to fulfil legal obligations, such as notaries and chamber officials in charge of identifying the winners of the prize competition organized on the Website, any public authority in charge of controlling the application of the rules on competitions and sweepstakes, as well as third parties indicated in the prize competition regulations, to which the data must necessarily be communicated to allow the User to take advantage of any prizes won (e.g. travel agencies, ticket offices, hotels, etc.).

8 RIGHTS OF DATA SUBJECTS

Users may exercise their rights pursuant to the Applicable Regulations by contacting the Data Controller as follows:

- By sending a registered letter with return receipt to the registered office of the Data Controller: Via Empedocle 28/a 95030 Pedara (CT);
- By sending an e-mail to: info@unleadmittedsrl.com.

We remind that the Users can contact the DPO at the e-mail: dpo@conversionmediaadv.com.

Pursuant to the Applicable Regulations, the Data Controller hereby declares that Users have the right to obtain information on (i) the source of their personal data; (ii) the purposes and methods of the processing; (iii) the logic applied to the processing, if carried out by means of electronic tools; (iv) the identity of the Data Controller and the Data Processor; (v) the parties or categories of party to whom the personal data may be communicated or who may gain knowledge of them in their capacity as data processing managers or persons in charge of processing.

Furthermore, Users have the right to obtain:

- a) **access, update, rectify** or, should they wish to do so, **integrate** their data;
- b) the **cancellation, transformation into anonymous form or blocking** of data which have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed;
- c) confirmation that the operations under a) and b) have been made known, including regarding their contents, to those to whom the data has been communicated or distributed, except in the event such compliance proves to be impossible or leads to the use of manifestly disproportionate means in respect of the right defended.

Furthermore, Users have:

- a) the right to **withdraw consent** at any time, if the processing is based on their consent (it should be noted that this withdrawal does not affect the lawfulness of the processing based on consent before the withdrawal);
- b) the right to **data portability** (the right to receive all their personal data in a format that is structured, commonly used and readable by automatic devices), the right to **limit the processing** of personal data and the **right to cancellation** ("right to be forgotten");
- c) the **right to object**:
 - i) in whole or in part, for legitimate reasons, to the processing of their personal data, even if pertinent to the purpose of the collection;
 - ii) in whole or in part, to the processing of their personal data for the purpose of sending advertising and direct marketing materials, or for carrying out market research or business communications;
 - iii) if personal data is processed for direct marketing purposes, at any time to object to the processing of their data for this purpose, including profiling in so far as it is connected to such direct marketing.

- d) Whereby it is believed that processing of the data is in breach of the Regulation, the right to file a complaint with the Supervisory Authority (in the Member State in which they normally reside, in which they work or in which the alleged violation has occurred). The UK supervisory authority is the Information Commissioner Office and their contact details are: The Information Commissioner's Office Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF <https://ico.org.uk/global/contact-us/> Tel: 0303 123 1113

The Data Controller is not responsible for updating all links that can be viewed in this Policy, therefore whenever a link is not functional and/or current, Users acknowledge and accept that they must always refer to the document and/or section of the websites referred to by the link.

9. UPDATES TO THIS PRIVACY POLICY

We may make changes to this privacy policy from time to time. You should check this page regularly to see our most up to date policy. This privacy policy was last updated 12 of August 2021.