

Privacy Policy

1. Purpose and scope

1.1. The Mondadori Group, a corporate group composed of the parent company Arnoldo Mondadori Editore S.p.A. and the companies controlled by the latter in accordance with article 2359 of the Italian Civil Code (hereinafter referred to as the "**Mondadori Group**"), has always considered the protection of the personal data of its customers and/or potential customers and users to be of primary importance, ensuring that the processing of personal data, carried out by any means, whether automated or manual, is carried out in full compliance with the protections and rights set forth by Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the "**Regulation**") and other applicable legislation on personal data protection. We respect your privacy and data protection rights and recognize the importance of protecting the personal data we collect and process. This Privacy Policy ("**Privacy Policy**") is designed to help you to understand what personal data we collect about you and how we use and share it. It also describes how you can access and update this information.

1.2. This Privacy Policy applies to you if you browse and/or interact with our website <https://www.plai-accelerator.com/> (the "**Sites**" or "**Website**", and "**Services**");

1.3. For the purposes of the Regulation, the data controller of your personal data is **Arnoldo Mondadori Editore S.p.A.**, with registered office in Via Gian Battista Vico 42, 20123 - Milan and administrative office in Via Mondadori 1, 20054 - Segrate (MI), enrolled in the Register of Companies of Milan, Tax code no. 07012130584 and VAT no. 08386600152 ("**Controller**" or "**we**", "**us**", "**our**")

You can contact us via the following channels:

- in writing to the Mondadori Group Privacy Office at the parent company Arnoldo Mondadori Editore S.p.A., Via Mondadori 1, 20054 - Segrate (Milan);
- by sending an e-mail to the e-mail address privacy@mondadori.it to the kind attention of the Mondadori Group Privacy Office;
- by calling +39 02 75421 and asking for the Mondadori Group Privacy Office.

Moreover, we have also appointed a data protection officer (hereinafter referred to as the "**DPO**"). You may feel free to contact the DPO for all matters relating to the processing of your personal data and/or should you wish to exercise your rights by sending a written communication to the e-mail address dpo@mondadori.it and/or by writing to the Data Protection Officer of the Mondadori Group at Arnoldo Mondadori Editore S.p.A., via Mondadori 1, 20054 - Segrate (MI).

2. Personal Data collected

2.1. The personal data that we collect about you broadly falls into the categories set out in the following table. This table also describes the legal bases on which we collect your personal data, how we get it and what we do with it. Some of this information you provide voluntarily when you interact with us. Other types of information may be collected automatically from your device, such as device data and service data. From time to time, we may also receive personal data about you from third party sources (as further described in the table).

Type of Personal Data	How we get it	What we do with it
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Contact details ● Email address	From you when you sign-up for our newsletter.	● Communicate with you and send our newsletter
Device data ● OS: version & type ● Browser ● IP Address ● Unique device Identifiers	Depending on how you choose to configure our cookie preference tool, we may collect this info automatically via other online services. For more information, please see our Cookie Policy .	● Analyze how our website is used so we can improve your experience ● Remember your settings ● Identifying your language preferences

3. How and why we use your personal data

3.1. We collect and process your personal data for the following purposes and on the following legal bases:

- **Providing and facilitating delivery of our sites:** We process your personal data to perform our contract with you for use of our Services and Sites and to fulfill our obligations under applicable terms of service.
- **Sending our newsletter upon your requests:** We process your personal data to send you our newsletter communications via email. Please see the relevant [privacy policy](#).
- **Carrying out other legitimate business purposes:** including, for example, carrying out M&A activities, maintaining security of our sites, and to protect against imminent harm to our rights, as required or permitted by law.
- **Complying with legal obligations:** We process your personal data when cooperating or complying with public and government authorities, courts or regulators in accordance with our obligations under applicable laws.

3.2. In certain circumstances, we will explain how and why we use your personal data in a supplementary notice at or before the point of collection. Where we refer to legal bases in this section, we mean the legal grounds on which organizations can rely when processing personal data.

3.3. If you have any questions about our legal bases for processing your personal data, please contact us at using the contact details above.

4. Sharing your personal data

Your personal data may be disclosed to specific entities that are considered recipients of such personal data. In fact, Article 4(9) of the Regulation defines a recipient of personal data as “a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not” (hereinafter referred to as the “**Recipients**”).

In this perspective, in order to properly carry out all the processing activities necessary to pursue the purposes set out in this privacy policy, the following Recipients may be in a position to process your personal data:

- third parties who carry out part of the processing activities and/or activities connected and instrumental thereto on behalf of the Controller. Such entities have been appointed as processors, whereby this expression is to be understood, pursuant to Article 4(8) of the Regulation, as *“a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller”*;
- individuals, employees and/or contractors of the Controller, who have been entrusted with specific and/or multiple processing activities of your personal data. Such individuals have been given specific instructions on the security and proper process your personal data and are defined, pursuant to Article 4(10) of the Regulation, as *“persons who, under the direct authority of the controller or processor, are authorised to process personal data”*;
- third parties who carry out processing activities and/or activities connected and instrumental to the same as autonomous controllers, including but not limited to consulting companies, freelance professionals, credit institutions, insurance companies, third-party companies and/or companies that are part of the Mondadori Group;
- where required by law or to prevent or suppress the commission of a criminal offence your personal data may be disclosed to public bodies or judicial authorities without them being defined as data subjects. Indeed, according to Article 4(9) of the Regulation, *“public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients”*.

5. Retention of your Personal Data

- 5.1. One of the principles applicable to the processing of your personal data relates to the limitation of the retention period, which is governed by Article 5(1)(e) of the Regulation, which provides that *“personal data are kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject”*.

In light of this principle, your personal data will be processed by the Controller only to the extent necessary for the fulfilment of the purpose set out above in this Privacy Policy. Please note that the. In particular, your personal data will be kept for a period of time equal to the minimum necessary, as indicated by Recital 39 of the Regulation, that is, up to ten years from the termination of the existing contractual relationship between you and the Controller, without prejudice to an additional retention period that may be imposed or permitted by law as also provided for by Recital 65 of the Regulation.

6. Transfers of your Personal Data

- 6.1. Your personal data will be processed by the Controller within the territory of the European Union.
- 6.2. If for technical and/or operational reasons it is necessary to use entities located outside the European Union, we hereby inform you that, where such entities process personal data on behalf of the Controller, they will be appointed as processors pursuant to article 28 of the Regulation and the transfer of your personal data to such entities, limited to the performance of specific processing activities, will be governed by the provisions of chapter V of the Regulation. Therefore, all necessary precautions will be taken in order to ensure the most complete protection of your personal data by basing such transfer: (a) on adequacy decisions of the receiving third countries issued by the European Commission; (b) on standard contractual clauses drafted by the European Commission; (c) on the adoption of *corporate binding rules*.

In any event, you may request further details from the Controller if your personal data has been processed outside the European Union and ask for evidence of the specific safeguards adopted.

7. How we store and safeguard your Personal Data

7.1. We care about protecting personal data. That is why we put in place technical and organization appropriate measures that are designed to secure your personal data.

8. Your privacy rights and choices

8.1. You have the following data protection rights:

- If you wish to **access, correct, update or request deletion** of your personal data, you can do so at any time.
- You can **object to processing** of your personal data, ask us to restrict processing of your personal data or request portability of your personal data.
- You have the right to **withdraw your consent and/or opt-out of marketing communications** we send you at any time. If you no longer wish to receive our newsletter, you may opt-out of receiving them by clicking on the "unsubscribe" or "opt-out" link in the communications we send you.
- You have the right to **complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the EEA and the UK are available [here](#).

8.2. You can exercise any of these rights by submitting a request to us or to our Data Protection Officer at the contact details set out above in this Privacy Policy.

9. Changes to this notice and questions

9.1. We may amend this Privacy Policy from time to time in response to changing legal, technical or business developments. When we update it, we will take appropriate measures to inform you, consistent with the significance of the changes we make. If we make material updates to this Privacy Policy, we will update the effective date at the top of the Privacy Policy.