PRIVACY POLICY

Information pursuant to Article 13 of the European Regulation 679/2016 (GDPR - General Data Protection Regulation)

This privacy policy (the "Policy") explains how your personal data is collected and processed by Gessi S.p.A ("Gessi") when you use its website at gessi.com (the "Website") or other platforms such as our social media pages or applications.

This Policy applies to all interactions with the Website, including browsing, creating an account, accessing our social media pages or applications, as well as to related communications. Additionally, it also applies to any other communications that contain a link to this Policy and to any interactions with us where you are specifically directed to this Policy

Throughout this Policy, we refer to the Website, its functionalities, our social media pages and applications, and related communications collectively as the "Services".

DATA CONTROLLER

The Data Controller is Gessi S.p.A., having its registered office at Parco Gessi, 13037 Serravalle Sesia (VC), bearing Tax Code and VAT No. 02235360027, reachable via e-mail at gessi@pec.gessi.it

DATA PROTECTION OFFICER

Gessi has appointed a Data Protection Officer ("DPO") who can be contacted at the following email address: dpo@gessi.it.

PROCESSED DATA

When you use the Services, we collect and process the following types of data that enable identification as an individual or relate to you as an identifiable person ("Personal Data"):

- Name
- Mailing address (including billing address and delivery address)
- Telephone number
- E-mail address
- IP address (from your IP address, we can roughly deduce your location)
- Social media account IDs
- Profile picture
- Data relating to the opening and reading of the e-mails we send you (e.g. date and time of opening, number of openings, type of device and e-mail client), collected through tracking pixels (see the section "Tracking pixels in e-mails")

All of these data types are collectively referred to as "Data" throughout this Policy.

LEGAL BASIS AND PURPOSE OF PROCESSING

Purpose of Processing	Legal Basis
Ensuring the functionality of the Services, including allowing access to the Website, social media pages and applications	Article 6 paragraph 1 f of the GDPR: pursuing a legitimate interest of the Data Controller
Analysing and improving the performance of the Services and quality control	• Article 6 paragraph 1 a of the GDPR: with consent of the Users • Article 6 paragraph 1 c of the GDPR: to the extent necessary for complying with a legal obligation • Article 6 paragraph 1 f of the GDPR: pursuing a legitimate interest of the Data Controller
Storing Data in your account (if registered), including personal data and preferences	• Article 6 paragraph 1 a of the GDPR: with consent of the Users • Article 6 paragraph 1 f of the GDPR: pursuing a legitimate interest of the Data Controller
Analysing Data for preparing company reports and improving/ensuring customised services	• Article 6 paragraph 1 c of the GDPR: to the extent necessary for complying with a legal obligation • Article 6 paragraph 1 f of the GDPR: pursuing a legitimate interest of the Data Controller
Responding to inquiries or requests for information and contact form submissions	• Article 6 paragraph 1 a of the GDPR: with consent of the Users • Article 6 paragraph 1 b of the GDPR: taking steps at the User's request prior to entering into a contract • Article 6 paragraph 1 f of the GDPR: pursuing a legitimate interest of the Data Controller
Transmitting administrative information, such as changes to our terms and conditions	• Article 6 paragraph 1 c of the GDPR: complying with a legal obligation • Article 6 paragraph 1 f of the GDPR: pursuing a legitimate interest of the Data Controller
Sending newsletters, advertising materials and/or other commercial and marketing communications	• Article 6 paragraph 1 a of the GDPR: with consent of the Users • Article 6 paragraph 1 f of the GDPR: pursuing a legitimate interest of the Data Controller
Using tracking pixels in e-mails (newsletters, commercial and marketing communications and other communications) to measure the opening and reading of messages, assess and improve our communications, and ensure their deliverability and security	• Article 6 paragraph 1 a of the GDPR: with consent of the Users • Article 6 paragraph 1 f of the GDPR: pursuing a legitimate interest of the Data Controller
Facilitating participation in promotions, contests, or other special offers	• Article 6 paragraph 1 a of the GDPR: with the consent of the Users • Article 6 paragraph 1 b of the GDPR: taking steps at the request of the User prior to entering into a contract

Managing pre-contractual activities, such as sending offers, credit assessment, and customer evaluation	• Article 6 paragraph 1 b of the GDPR: taking steps at the request of the data subject/Users prior to entering into a contract • Article 6 paragraph 1 f of the GDPR: pursuing a legitimate interest of the Data Controller
Fulfilling contractual and tax obligations arising from our relationship with the subject	• Article 6 paragraph 1 b of the GDPR: performing the contract to which the data subject is a party • Article 6 paragraph 1 c of the GDPR: complying with a legal obligation
Conducting accounting, invoicing, document management, and statistical analysis	• Article 6 paragraph 1 c of the GDPR: complying with a legal obligation • Article 6 paragraph 1 f of the GDPR: pursuing a legitimate interest of the Data Controller
Managing returns and refunds, and providing customer service, including responding to requests for information and complaints	Article 6 paragraph 1 b of the GDPR: performing the contract to which the data subject is a party
Establishing, exercising or defending a legal right	Article 6 paragraph 1 f of the GDPR: pursuing a legitimate interest of the Data Controller

NATURE OF DATA PROVISION

Providing your Data for the purposes mentioned above is generally optional. However, certain Data may be necessary to provide specific Services you request. We will indicate mandatory fields in our forms with an asterisk (*). If you choose not to provide Data marked as mandatory, we may not be able to provide the related Services.

DATA RECIPIENTS OR POSSIBLE CATEGORIES OF DATA RECIPIENTS

Your Data will be processed by the Data Controller and by the persons strictly authorised by it to process the Data.

Your Data may be disclosed to the following categories of third-party recipients:

- External natural and/or legal persons that the Data Controller may engage to support or facilitate the Services and that are authorised to process the Data as a data processor under a specific agreement with the Data Controller (GDPR Article 28), or as autonomous data controllers (GDPR Article 4, paragraph 1, no. 7), also by virtue of the law;
- Parties to whom such communication must be made in order to fulfil or require the fulfilment of specific obligations laid down by laws, regulations and/or national and EU legislation, such as public agencies and other public authorities; and
- Other subsidiaries and/or associates and/or affiliates of the Data Controller that are part of the “Gessi Group”.

DATA TRANSFERS TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

In managing our relationship with you, we may need to transfer your Data to countries outside the EU and/or to international organisations to achieve the purposes of the processing. In such cases, we will adopt and implement all appropriate security, protection and confidentiality measures to safeguard the Data in compliance with the applicable data protection regulations.

RETENTION PERIOD

Your Data will be kept only for as long as necessary to achieve the purposes for which it was collected and, thereafter, for the term provided by any applicable regulation.

Gessi SpA

To determine the retention period, we consider the following:

- We retain Data for the period of time during which we have a contractual relationship (if any) with you and/or during which we provide the relevant Services (e.g. as long as you have an account on the Website or use our Services);
- We check whether archiving is necessary depending on our legal situation (e.g. with regard to limitation periods, procedures or checks by authorities); and
- We check whether we are obliged by applicable law to retain the Data for a further period (e.g., in the case of purchase transactions, we may be obliged to keep records of your transactions for a certain period of time).
- Data relating to the tracking of e-mail openings are retained for as long as necessary for the purposes indicated above and, in any case, no longer than until consent is withdrawn.

DATA SUBJECT RIGHTS AND HOW TO EXERCISE THEM

You may, in any case and at any time, exercise the following rights:

- Request access to your Data, rectification or deletion of your Data, restriction of the processing, and portability of your Data under Articles 15-20 of the GDPR and/or object to the processing of your Personal Data. Where processing is based on your consent, you may withdraw that consent at any time, without affecting the lawfulness of processing carried out before its withdrawal. You may also withdraw only your consent to tracking through tracking pixels, while continuing to receive our communications without such tools, as described in the section “Tracking pixels in e-mails”.
- You may exercise your rights via e-mail by writing to us at privacy@gessi.com
- Lodge a complaint with the Italian Data Protection Authority (see website: www.garanteprivacy.it).

EXISTENCE OF AN AUTOMATED DECISION-MAKING PROCESS

The processing does not involve any automated decision-making processes.

TRACKING PIXELS IN E-MAILS

The e-mails we send you (e.g. newsletters and commercial and marketing communications) may contain tracking pixels, i.e. small images, often transparent and very small (a single pixel), hosted on remote servers. When you open the message, the pixel is downloaded by your e-mail client and makes it possible to detect that the e-mail has been opened and read (e.g. date and time, number of openings, type of device and e-mail client, IP address). The pixel is downloaded only if your e-mail client allows images to be downloaded: if you disable automatic image downloading or read e-mails in plain-text format only, the pixel is not downloaded.

We use tracking pixels to measure the opening and reading of e-mails on an individual basis, and thus to assess and improve our communications, only with your consent. Such consent is requested, after providing this Policy and before sending e-mails containing tracking pixels, on an optional and neutral basis, when your e-mail address is collected, by means of a dedicated, non-pre-ticked box.

As regards the e-mail addresses already included in our lists at the date of update of this Policy, we hereby inform you of the use of tracking pixels; you may withdraw your consent to tracking at any time as described below.

We may use tracking pixels without requesting consent in the cases where the Guidelines of the Italian Data Protection Authority allow it, for example where they are used: (i) for statistical counts of the overall opening rate of messages, functional to improving e-mail deliverability and countering spam, with pixels that are identical for all recipients of the same campaign and with anonymisation of other technical data (e.g. IP address and e-mail client); (ii) for security purposes connected with user authentication (e.g. account activation confirmation, password change requests,

replies to requests to exercise data protection rights); (iii) in institutional or service messages that we are legally obliged to send you and for which actual acknowledgement by the recipient matters (e.g. notices of security incidents or of contractual changes). Even in these cases, we provide this Policy.

You may at any time, easily and free of charge, withdraw your consent to tracking through the link or icon in the footer of each e-mail, which leads to a dedicated area where you can choose to:

- stop receiving our e-mails (e.g. by using the "unsubscribe" link); or
- continue receiving our e-mails without tracking pixels.

Your choices are recorded separately. Refusing or withdrawing consent to tracking does not entail any limitation on your use of the Services or on receiving our communications.

The Data Controller applies the Guidelines of the Italian Data Protection Authority on the use of tracking pixels in e-mail communications of 17 April 2026 (decision no. 284 - web doc. no. 10241943, published in the Official Gazette no. 98 of 29 April 2026).

COOKIE MANAGEMENT AND NOTICE

A cookie is a small, simple file that is sent along with pages of this Website and stored by your browser on the hard drive of your computer or another device. The information stored therein may be returned to our servers or to the servers of the relevant third parties during a subsequent visit.

Cookies can be:

- first-party cookies, i.e., cookies installed directly by the Data Controller; and/or
- third-party cookies, i.e., cookies from sites or web servers other than the one hosting this Website, used for purposes specific to those third parties.

The Data Controller has read and applies the provision of the Italian Data Protection Authority "Identification of simplified methods for the provision of information and acquisition of consent for the use of cookies" of 8 May 2014 - [web doc. no. 3118884] (Published in the Official Gazette no. 126 of 3 June 2014), "Guidelines on the use of cookies and other tracking tools" of 10 June 2021, and the European Data Protection Board Guidelines 5/2020 on consent under Regulation 2016/679.

In this regard, we apply the Cookie Policy that can be found hyperlinked herein.

Updated as of 10/2026