

## ▪ Privacy Policy

In accordance with article 13 of EU Regulation 2016/679 (hereinafter referred to as “GDPR”), this Privacy Policy provides detailed information on the processing of the personal data entered into or collected on our website [www.bticino.it](http://www.bticino.it) (the “Website”), as well as on any other websites on which this policy is published.

### Controller and Data Protection Officer (DPO)

The Controller is BTicino S.p.A., Viale Borri 231, 21100 Varese, email [privacy@pec.bticino.it](mailto:privacy@pec.bticino.it) (hereinafter referred to as the “Company” or the “Controller”).

You may contact the Data Protection Officer (DPO) at the following email address: [dpo@pec.bticino.it](mailto:dpo@pec.bticino.it).

### Personal data we process

We collect the following categories of personal data:

- Common data: name, surname, email address, telephone number, company (if any), VAT No., occupational sector and country, navigation data.

### Purposes of processing, legal grounds and storage terms

#### *a. Collection of navigation data*

During their normal operation, the computer systems and software procedures that are involved in the functioning of the site acquire certain personal data. This information is not collected for the purpose of being associated with any identified data subjects but could, if processed and combined with other data held by third parties, lead to the identification of the concerned data subjects.

These data include the IP addresses and domain names of the computers that are used to 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 sent in response, the numeric code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user’s operating system and IT environment.

These data are used for the sole purpose of obtaining anonymous statistical information on the use of the website and to make sure that the website is functioning properly and are deleted immediately after processing.

They could also be used to determine liability in the event of a computer crime perpetrated to the detriment of the website.

The legal basis for processing of the personal data is the legitimate interest of the Controller; as to the period of storage of the data, please view the Cookie Policy published on the [bticino.it](http://bticino.it) website.

#### *b. Use of cookies*

Cookies are small text files downloaded by a website on the user’s computer when the latter accesses the website, for the purpose of storing and/or carrying information. Cookies are sent by a web server (that is the

computer on which the website is being executed) to the user's browser (Internet Explorer, Mozilla Firefox, Google Chrome, etc.) and stored on the user's computer. They are then sent back to the website at the user's next visits.

Certain activities may not be carried out without cookies, which, in some cases are therefore strictly necessary. In other cases, the website uses cookies to make navigation easier or to enable users to receive the services they have specifically requested. No personal data of the users are acquired by this website for said purpose. Use of the so-called session cookies (that is those cookies that are not persistently stored on the user's computer and disappear as the user closes the browser) is required to ensure secure and effective browsing of the website.

This website also operates third-party cookies, that is cookies that are created by websites other than the one that the user is currently visiting. Third-party cookies used by this website are of an anonymous nature. They are used to anonymously collect and record information on the pages accessed by the user on each single website but do not allow to identify the user and are in no way combined with other information. These data are used exclusively to track and analyse how websites are used by users and to compile statistics based on information collected anonymously and in an aggregate form.

You may reject the installation of cookies by disabling them on your browser (Internet Explorer, Mozilla Firefox, Safari etc.). This, however, may mean that some web page functions will not be executed correctly.

*c. Registration to the reserved area and account generation*

Although the bticino.it website is free to access and navigate, some online services are only accessible after registration to the "MyBTicino" reserved area.

With this regard, please be informed that the Company operates an Identity Management system, which enables registered users to access all of the BTicino websites/services/apps (hereinafter referred to as the "Services"), regardless of the device they are using, simply by entering their login credentials. This means that once they have registered for one of the above Services, users are able to access all of the others (subject to acceptance of the related terms and conditions) via their login credentials (e-mail + password), with no need to register again.

Registration involves filling out of an online form in which users are required to enter their personal data (name, surname, email address, company (if any), VAT number, occupational sector and country) for the activation of login credentials (email + password), which they will then be able to use to access website areas and services that are reserved for registered users.

Access to the reserved area may also take place via "social login", meaning that the Company acquires some of the personal data you may have supplied to a third party (e.g.: Facebook). You are therefore invited to:

- check the data you have provided to the social network and ensure they are kept up to date;
- check the social network's settings and view the related privacy policy.

The Company will store your identification code for the social network when you use it to access your personal area. This information will be stored for the time required to enable you to access your personal area.

In particular, registration to our portal is required to access the services made available through connected websites. Services offered through our portal include, without limitation:

- Access to price lists;
- quote service;
- possibility to search available training courses;

- services associated with the sale of BTicino and Legrand Group products, including customer support service;
- information on prize contests run by the Controller;
- downloading of design and quote SW;
- warranty extension (free or subject to fee agreements for BTicino/Legrand products/systems);
- promotions.

Subject to express consent provided by users upon registration (which may be modified from the portal at a later time), personal data of users registered to the “MyBTicino” reserved area may be used by BTicino S.p.A. and the other Legrand Group companies also for the additional purposes described under items g and h below. In this case, the legal basis for processing is fulfilment of a request submitted by the data subject or compliance with contractual requirements. The data will be stored for ten years from cessation of the contractual relationship (e.g.: from when the account is closed by the user).

*d. Providing assistance to the data subject*

The data subject may contact the Company via the freephone and/or online form available on the website to request commercial and/or technical information on the products/services offered.

In order to be able to recognise the data subject and provide the necessary assistance, the Company collects certain personal data, including name, surname, business name, address, town/city, post code, province, e-mail, telephone number.

Assistance is also supplied on the back of specific plant commissioning, repair or maintenance agreements, which may be offered both against payment or for free. In order to be valid, these agreements need to be registered on our systems and specific personal data need to be supplied by the customer.

In this case, the legal basis for processing is the provision of technical or commercial assistance after or before the sale of products and services. Additionally, the processing may include the assessment of customer satisfaction regarding the quality of services provided by BTicino S.p.A. Additionally, the processing may include the assessment of customer satisfaction regarding the quality of services provided by BTicino S.p.A. Data will be stored for a period of six months from collection, except where connected with agreements for the supply of pre- or after-sales services, which will be stored for the duration of the commercial relationship and/or as long as required to comply with the related legal requirements.

*e. Legal requirements*

Compliance with the requirements laid down in the applicable supranational and national legislation (laws and regulations, including industry-specific regulations).

In this case, the legal basis for processing is compliance with certain legal requirements that are applicable to the Company. The data will be stored for as long as necessary to fulfil said legal requirements;

*f. Defending legal claims and recovering debts out of court*

The data may be processed by the Controller as necessary to establish, exercise or defend legal claims or to recover debts owed by the data subjects;

In this case, the legal basis for processing is the legitimate interest of the Company to act in court against the data subject. The data will be stored for the duration of litigation proceedings, up until when all time limits for any appeal actions have expired.

*g. Direct marketing*

Subject to express consent provided by the data subject upon registration to the BTicino portals, the Company may use his or her personal data for direct marketing activities, such as promotional and commercial communications regarding the products and/or services offered by the Company, including of an informative nature (newsletters, catalogues, discount vouchers, invitations to trade fairs, training courses and promotional events, participations in communities of various types), through both automated (text messages, e-mails, etc.) and conventional (telephone calls, conventional mail, etc.) contact means. Such activities may also regard the measuring of customer satisfaction on the quality of the products/services provided by BTicino S.p.A.

In this case, the legal basis for processing is consent by the data subject. The data will be stored up until withdrawal of consent.

*h. Third-party marketing*

Subject to express consent provided by the data subject upon registration to the “MyBTicino” portal, the Company may transfer his or her personal data to third-party companies, including the Legrand group companies, for their own marketing activities. Such activities may include, in particular, promotional and commercial communications regarding the products and/or services offered by the Company, including of a technical nature (newsletters, catalogues, discount vouchers and participations in communities of various types), through both automated (text messages, e-mails, social networks, instant messaging apps, push notifications, etc.) and conventional (telephone calls, conventional mail, etc.) contact means.

In this case, the legal basis for processing is consent by the data subject. The data will be stored up until withdrawal of consent.

*i. Technical/commercial consultancy, offer and sale*

Personal data may be processed for the purpose of providing technical/commercial consultancy, invitations to trade fairs, training courses and promotional events, offer and sale of products and systems marketed by BTicino and/or other Legrand group companies through a direct commercial relationship with BTicino S.p.A.’s Technical/Commercial Managers.

In this case, the legal basis for processing is the legitimate interest to conduct consultancy, offer and sale activities regarding products and systems through a direct relationship with BTicino’s Technical/Commercial Managers. Additionally, the processing may include the assessment of customer satisfaction regarding the quality of the consultancy provided by the technical-commercial officers of BTicino S.p.A. The data are collected by the manager during normal contact activities with customers and will be stored for the duration of the commercial relationship between the customer and the managers, with a maximum of two years of no contact.

*l. Registration to trade fairs, training courses, promotional events or for research purposes.*

Personal data may be processed for the purpose of registering to the website in relation to attendance to trade fairs, promotional events or for research purposes organised by BTicino S.p.A. The Company will use personal data to manage the events attended by the data subject, as well as to send all associated communications, including for organisational purposes (e.g.: logistics) with reference to the products being promoted (e.g.: technical documentation, promotional literature, invitations to other events/training courses, for research purposes). The contact methods can be automated (sms, e-mail, chatbot...) and traditional (telephone, mail...).

In this case, the legal basis for processing is fulfilment of a request submitted by the data subject, which is take part in the event. Additionally, the processing may include the assessment of customer satisfaction regarding the quality of services provided by BTicino S.p.A.

The data will be stored for a maximum of three months from the event date or for a maximum of 18 months for research purposes.

*m. Recording of audio, video and photographic content and interviews.*

The purpose of processing is the collection of audio/video content and interviews and the circulation of the same. Namely, to reproduce said content on BTicino S.p.A.'s platforms (including, without limitation, the [www.bticino.it](http://www.bticino.it) portal and its associated websites), to circulate said content on BTicino S.p.A.'s official social pages (including, without limitation, Facebook, Twitter, YouTube, Instagram, Salesforce Chatter and Microsoft Stream), to use said content during commercial events, trade fairs and training events, to print and publish said content as part of BTicino spa's promotional material. The content collected will be stored electronically or on any type of media for the specified purpose. In this case, the legal basis for processing is consent by the data subject. In this case, the legal basis for processing is consent by the data subject. The data reproduced on BTicino's platforms will be stored up until withdrawal of consent. Any data shared on social platforms are managed by the owners of said social platforms and are no longer owned by or under the control of BTicino. In these cases, the data subject, having been informed of such possibility at the time of collection of the data and having given his or her specific authorisation to processing at that time, must contact the social platform on which his or her data have been shared for information on the exercise of his or her rights.

*n. Promotional Offers*

Personal data may be processed for the purpose of participating in promotional offers made available by BTicino S.p.A. The Company will use the personal data for the management of the promotion in which the data subject chooses to participate, as well as for any communications associated with the same, including of an organisational nature (e.g.: logistics) and/or relating to the products included in the promotion (e.g.: technical documentation, associated promotions, invitations to take part in training courses). Such promotional offers may be made known via computerised means (es. e-mails, banners on websites, etc.) and/or conventional means (es. leaflets at the sale outlet). The data could also be disclosed to third parties, namely the distributor responsible for the sale, exclusively for the completion of the sale.

In this case, the legal basis for processing is fulfilment of a request submitted by the data subject, which is to participate in the promotional offer.

The data will be stored by BTicino for a maximum of three months from the end date of the promotional offer.

**Mandatory/voluntary provision of data**

Provision of the data for the purposes under items:

- c) is mandatory for registration to the website and use of the services accessible only via the reserved area; failure to provide the data does not affect free navigation on the website pages that do not require registration;
- d) is mandatory to receive telephone support;
- e) is mandatory to enable the Controller to comply with the requirements laid down in the applicable supranational and national legislation (laws and regulations, including industry-specific regulations);
- f) is mandatory to protect the legitimate interest of the Controller to defend legal claims or to recover debts owed by the data subjects;
- g) – h) is voluntary. Failure to provide the personal data will bear no consequence whatsoever, except in terms of the impossibility of receiving promotions, discounts and commercial communications or information about marketing initiatives launched by third-party companies, including the Legrand Group companies;
- i) is mandatory for the provision of the technical/commercial consultancy, offer and sale services;
- l) is mandatory for registration to trade fairs, training courses, promotional events or for research purposes organised by BTicino S.p.A.;
- m) is mandatory for the recording of audio, video and photographic content and interviews;
- n) is mandatory to participate in promotional offers.

**Categories of recipients of personal data**

Your personal data will be processed by employees and/or contractors of the Controller who have received adequate operating instructions and have been expressly authorised to do so.

Your data may be disclosed to independent controllers, including, without limitation:

- Supervisory and Monitoring bodies and authorities in general, public or private, who are authorised to request disclosure of your data;
- Authorised third parties, for the performance of activities that are instrumental to those carried out by the Controller, therein including, without limitation, administrative, accounting and tax-related activities;

The data may also be processed, on behalf of the Company, by external parties designated as external data processors, including, without limitation:

- third-party IT service providers and IT support providers that are engaged in the correct and dutiful pursuit of the above purposes;
- other Legrand Group companies, for the above purposes.

## Your rights

With regard to the processing of your personal data by the Controller, you have the right to request access to, erasure of and rectification of personal data, to have incomplete personal data completed, to request restriction of processing in the cases listed under article 18 of the GDPR, to object to processing, for reasons connected to your specific situation, in the cases where a legitimate interest is being pursued by the Controller.

Where processing is based on consent or on a contract and is carried out by automated means, you have a right to receive a copy of your data in a structured, commonly used, machine-readable format, and, if technically feasible, to transmit it to another controller.

You shall have the right to lodge a complaint with the Data Protection Authority at any time, as well as to seek any other remedies available under the applicable law.

In order to exercise your rights, you may contact the Controller by sending a written communication to the above address or an email to [privacy@pec.bticino.it](mailto:privacy@pec.bticino.it)