



MASSIMO ZANETTI
BEVERAGE GROUP

PRIVACY AND COOKIE POLICY

1 • Introduction

Welcome to our website investors.mzb-group.com (regarding the website www.mzb-group.com please refer to the related Privacy and Cookie Policy). When you use our website or its services (hereinafter, the "**Website**" and the "**Services**"), we collect information and personal data which concern you. For this reason, in compliance with the provisions of the General Data Protection Regulation no. 679/2016 ("**GDPR**") and the applicable national law (together, "**Privacy Law**"), we have prepared this document (hereinafter "**Privacy Policy**") with the purpose of describing what personal data we collect, the relevant processing purposes and methods and the security measures we adopt to protect it.

2 • Source of the data and purpose of the data processing

2.1 Browsing data

The IT systems responsible for the operation of the Website acquire, during their normal operation, some of your personal data whose transmission is implicit in the use of the Internet communication protocols. This information is not collected with the purpose of identifying you, but could lead to your identification if, for example, it were combined with data held by third parties. This category of data includes the IP address and the domain name of your computer, the URIs (Uniform Resource Identifier) of the resources requested, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numeric code indicating the status of the response given by the server and other parameters relating to your operating system. We use this data only in order to obtain anonymous statistical information on the use of the Website and to check its correct operation. We erase the collected data immediately after it is processed. The data could be used to ascertain liability in case of cyber crimes committed to damage the Services.

2.2 Registration information and additional information provided by the user

The use of our Website does not require the creation of a personal account. However, to access some pages reserved to registered users and, for example, to always be notified on new communications, presentations or institutional documents, you must subscribe to our "Email Alert" service. For more information on this, please read the related privacy policy on the "[Email Alert](#)" page.

Should you collect, process and communicate information referring to third parties, you must do so in compliance with the provisions of the Privacy Law and, as a consequence, you must give them previous information on the processing and, if necessary, you must collect their free and express consent prior to performing the processing.

2.3 Purpose and nature of the processing

Providing us with the registration information stated above is necessary to provide the Services requested via the Website; to conduct statistical analyses and surveys; to fulfil legal obligations, European regulations and legislation and to exercise rights in court.

Should you refuse to provide it, you would in any case be permitted to use the Website, but you would not be able to use some of our Services.

2.4 Legal bases of the processing

We process your personal data only in the presence of one of the legal grounds envisaged by applicable law, and specifically:

a) to fulfil a legal obligation to which Massimo Zanetti Beverage Group S.p.A. is subject;

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b) for the legitimate interest of Massimo Zanetti Beverage Group S.p.A., with particular reference to the management of the Website, the prevention and pursuit of fraudulent activities, as well as for internal administrative purposes;

2.5 Information collected via cookies and other technologies

Cookies are small files sent by the websites visited by users and saved on the device used to access these sites. When the users visit the same website again, the browser reads the cookies saved on the device and resends the information to the website which originally created the cookies. Also our website uses various types of cookies and other technologies for reading and storing information on the user's device in order to conduct statistical analyses, for example. We do not use cookies which are able to start programs on your devices or send viruses to them, or that are able to control your devices.

On the Website you can also find social buttons/widgets, i.e. those special buttons showing the social network icons. These buttons allow those users who are browsing the Website to directly reach and interact with the social networks with a click.

In compliance with the provisions of measure of 8 May 2014 of the Italian Data Protection Authority, we hereby inform you that our Services use:

- *technical cookies* necessary for the operation of the Website, including the provision of the Services offered by it. This category of cookies includes the analytics, session and functionality cookies, used by the data controller to, for example, collect information in an aggregated manner on the number of users and on how they use the Website or to save your browsing preferences, such as the language. To use technical cookies, the consent of the user is not requested.
- *analytics cookies* are used to process statistical analyses on the browsing methods of the website users and are collected in an anonymous manner and exclusively for statistical purposes.

The cookies above may be:

- temporary, when they are automatically erased at the end of the connection;
- permanent, when they are saved on the user's hard disk, unless the user deletes them;
- cookies installed by the publisher, when they are set and managed directly by the manager of the Website;
- third-party cookies, when they are managed by a different domain from the one visited by the user.

You can manage and deactivate the cookies directly from the browser settings:

- [Internet Explorer](#)
- [Google Chrome](#)
- [Safari](#)
- [Firefox](#)

or through the portal www.youronlinechoices.com/it. Once in the website, by accessing the "Your choices" area, the user may view the list of the third party companies which install cookies on our website ("Companies"); check the presence and the activity status of the installed cookies ("Status") and manage the consent one by one ("On/Off"). By expanding the dedicated item (Info) of each company, more information can be received concerning the company and the specific information regarding privacy and cookies can be reached via a link.

Below is the table with the cookies used by our Services.



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Nature	Type and name	Term
Cookies installed by the publisher	Session technical cookies - PHPSESSID	Session
Third-party cookies - Google Analytics Privacy Policy - Cookies specifications	_gat	24 hours
Third-party cookies - Google Analytics Privacy Policy - Cookies specifications	_gid	24 hours
Third-party cookies - Google Analytics Privacy Policy - Cookies specifications	_ga	2 years

3 • Method of processing data and data retention

We process your personal data with the help of electronic tools and always in compliance with the security requirements requested by the applicable regulations, with particular but not exclusive reference to Annex B of Leg. Decree 196/2003 (Technical specifications concerning minimum security measures). Our security measures include contractual tools with any contractual party (e.g. service providers) or agent in order to ensure the protection of the security and confidentiality of your personal data in compliance with the provisions laid down by the Privacy Law.

Your personal data is retained for the time strictly necessary to achieve the purposes for which it was collected and for the fulfilment of the applicable legal and regulatory obligations. The data will be erased or subject to de-identification in a permanent manner upon reaching the purposes stated above, unless Massimo Zanetti Beverage Group S.p.A. is obliged to retain the data for an additional period to fulfil legal or regulatory obligations.

In any case, for technical reasons, the termination of the processing and the consequent definitive erasure or irreversible de-identification of the related personal data will be definitive within thirty days from the terms stated above.

4 • Area of the communication

4.1 Internal and external communication of personal data

Your personal data will only be processed by subjects previously authorised for the processing.

Your data may be communicated to the following categories of external subjects: service providers (professional and technical) and legitimate recipients pursuant to law. The recipients of the data act as data controllers, data processors or persons in charge according to the applicable law. Should we be involved in a reorganisation, acquisition or sale of our company or part of it, we will communicate your data to the third parties involved in the procedure. Any third party which, as part of this procedure, is a recipient of your data may use it within the limits established by this Privacy Policy.

4.2 Transferring data abroad

We may transfer your personal data outside Italy to third party recipients established within the European Union. This transfer is free since each country of the European Union guarantees a suitable level of data protection. However, for the purposes stated above, we may transfer your data also to third party countries not belonging to the European Union, which do not guarantee the same level of data protection. Nevertheless, we hereby inform you that such transfer to third party countries will always take place in accordance with the provisions of the Privacy Law, i.e. by obtaining your consent, when necessary, or by adopting any other measure required to guarantee the security of the data subject to transfer. Included among these measures are possible contractual agreements based on *standard contractual clauses* as drawn up by the European Commission.

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5 • Rights of the data subject

At any time you may exercise the rights recognised by the Privacy Law, and may, for example, access the data, check its content, origin, accuracy, request for it to be supplemented, updated, rectified, erased, object to processing or request its restriction, or even request its portability. To exercise these rights please contact us at the addresses under paragraph 6.

6 • Data Controller

The Website and Services are managed by Massimo Zanetti Beverage Group S.p.A., with registered office in Viale G.G. Felissent, 53 – 31020 Villorba (TV) - Tel. +39 0422 312611, email: info@mzb-group.com, who acts as data controller.

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