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PRIVACY POLICY APP SISAL – THE DREAMER EXPERIENCE

Pursuant to Article 13 of Regulation (EU) 2016/679 (hereinafter the "Regulation"), this document describes how we process the personal data of users (the "Data Subjects" or the "Users") using the Sisal – The Dreamer Experience APP (the "APP").
Please notice that this privacy policy does not concern other sites, pages or online services that can be reached through hypertext links that may be published in the APP, but which refer to resources outside the APP internet domains.
Specific privacy policies are published on the APP pages or reachable through the app and designed for the provision of certain services.

1. IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

The Data Controller (the "Controller") is **Sisal Italia S.p.A.,** with registered office in Via Ugo Bassi, 6 - 20159 Milano, which may be contacted at privacy_sisal@legalmail.it.

2. CONTACT DETAILS OF THE DATA PROTECTION OFFICER

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

3. CATEGORIES OF DATA PROCESSED

Navigation data / Data related to the functioning of the APP

The information systems and software procedures related to the performance of the APP acquire, while they are running, some personal data whose transmission is necessary for their normal operation. This category of data includes, for example, information relating to the mobile device on which the APPs are installed and certain parameters relating to the operating system (Android or iOS). This category of data includes IP addresses or domain names of the devices used by Users, URI/URL (Uniform Resource Identifier/Locator) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical 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 computer environment.

Data willingly provided by the costumer

The optional, explicit and voluntary sending of messages to the contact addresses published on the APP, the use of telephone/fax numbers, the filling in and submitting of the forms on the APP, imply the acquisition of the User's contact data, needed to reply to the requests, as well as all the personal data communicated by the User or in any case requested (for example during the forms filling in).
Please note that, although for using the Meta Quest and the APP the User is requested to log into his Meta account, this APP does not collect social login data, i.e., the credentials used by the User to log into the Meta Quest and use the APP.

Data collected via SDK

Please refer to the SDK policy available on the APP.

4. PURPOSES, RETENTION PERIOD AND LEGAL BASIS OF PROCESSING

The Data Controller processes the User's personal data for specific purposes and only on a legal basis, according to the Data Protection Applicable Law. The list below concerns all the processing carried out by the Data Controller to allow the use of the APP and its proper functioning. In particular, the Data Controller processes the personal data of the Users for the following purposes, legal bases and retention periods:

a) **Operation of the APP, provision of related services and control of their proper functioning:** the legal basis for these data processing is the execution of a contract to which the User is party (art. 6, paragraph 1, letter b) of the Regulations). No personal data is going to be stored by the APP outside the play session.
b) **Answering the requests of the Data Subject:** the legal basis of this data processing is the execution of a service requested by the User (art. 6, paragraph 1, letter b) of the Regulation). Personal data are stored for a maximum of 36 months.

After the retention periods specified above, personal data are irreversibly deleted or transformed into anonymous form.

5. COMMUNICATION AND DISCLOSURE

For the pursuit of the aforementioned purposes, the Data Controller reserves the right to communicate your personal data to recipients belonging to the following categories:

a) public authorities and / or supervisory bodies (eg judicial authorities, Customs and Monopolies Agency, Bank of Italy, public security authorities, Financial Investigations Office, etc.);
b) other companies of the group to which the Data Controller belongs, or in any case parent companies, subsidiaries or associates, pursuant to art. 2359 of the Italian Civil Code, also located abroad, in the context of the existing intercompany agreements for the management of the activities referred to in the aforementioned purposes;
c) subjects who carry out data acquisition, processing, processing and storage services;
d) subjects that provide services for the management of the Data Controller's information system and telecommunications networks (including chat and mailing services);
e) subjects who carry out assistance activities to the Data Subject;
f) professional firms or companies in the context of assistance and consultancy relationships;
g) subjects who carry out communication assistance and consultancy activities;
h) subjects who carry out operations of control, revision and certification of the activities carried out by the Data Controller;
i) subjects who for various reasons succeed the Company in the ownership of legal relationships (e.g., transferees or potential transferees of goods, credits and / or contracts).

Considering the scope of the APP, data may also be shared with Meta Platforms, Inc., as the party providing the Meta Quest.

The subjects belonging to the above categories operate independently as separate Data Controllers, or as Managers appointed for this purpose by the Data Controller. The updated list of third parties to whom the data are transmitted is available by forwarding a request to privacy_sisal@legalmail.it. The data may also be known, in relation to the performance of assigned tasks, by the Controller's own personnel, specifically authorized by the Controller to process the data. Your personal data, in any case, will not be disseminated and, therefore, will not be brought to the attention of unspecified parties, in any form, for example by making them available or consulting them, without the express consent of the interested party, when requested.

6. TRANSFER OF DATA OUTSIDE THE EU

The Data Controller acknowledges that, for the pursuit of the aforementioned purposes, the personal data of the Data Subjects may be disclosed to subjects located in countries outside the European Union for the pursuit of the aforementioned purposes. This transfer will take place solely in the face of the existence of international agreements or adequacy decisions by the Commission (pursuant to Article 45 of the Regulation) or on the basis of the instruments referred to in art. 46 of the Regulations, including the Standard Contractual Clauses or the stipulation of binding corporate rules ("Binding Corporate Rules" or "BCR" pursuant to Article 47 of the Regulation) and the adoption of other measures required by the applicable processing legislation. A copy of any personal data transferred abroad, as well as the list of third countries / international organizations to which the personal data have been transferred, can be requested from the Data Controller at the email address privacy_sisal@legalmail.it.

7. RIGHTS OF THE DATA SUBJECT

Pursuant to Articles 15 to 22, the Regulation gives the Data Subjects the possibility to exercise specific rights. In particular, the Data Subject may obtain:

a) confirmation as to whether or not personal data relating to him are being processed and, if so, **access** to such data;
b) the **correction** of inaccurate personal data and the integration of incomplete personal data;
c) the **deletion** of personal data concerning him/her, in cases where this is allowed by the Regulation;
d) the **limitation** of processing, in the cases provided for by the Regulation;
e) the **communication**, to the recipients to whom the personal data have been transmitted, of **requests for rectification/deletion** of personal data and restriction of processing received from the Data Subject, unless this proves impossible or involves a disproportionate effort;
f) the receipt, in a structured, commonly used and machine-readable format, of the personal data provided to the Controller, as well as the transmission of the same to another data controller (so-called **data portability**);

The Data Subject shall also have the right to **object** at any time, on legitimate grounds, to the processing of personal data concerning him/her, even if pertinent to the purpose of collection, unless the Data Controller demonstrates compelling legitimate grounds or the exercise or defense of a right pursuant to Article 21 of the Regulation. The Data Subject shall also **have the right not to be subject to a decision based solely on automated processing, including profiling**, which produces legal effects concerning him/her or significantly affects his/her person in a similar way, unless such a decision: a) is necessary for the conclusion or performance of a contract between the Data Subject and the Data Controller; b) is authorized by the law of the Union or of the Member State to which the Data Controller is subject; c) is based on the explicit consent of the Data Subject. In the cases referred to in letters a) and c) above, the Data Subject shall have the right to obtain human intervention by the Controller, to express his/her opinion and to contest the decision.

The interested party may submit requests to the following address privacy_sisal@legalmail.it indicating in the subject line "Privacy - Exercise of Privacy Rights", detailing which right he/she intends to exercise and providing the Data Controller with the information necessary to identify him/her in accordance with Articles 11 and 12 of the Regulation.

The Data Subject is also entitled to **lodge a complaint with the supervisory authority** of the Member State in which he/she normally resides, works or in which the alleged breach occurred (e.g., the Italian Data Protection Authority, which can be contacted at the addresses available on the website www.garanteprivacy.it), as provided for in Article 77 of the Regulation, as well as to **take appropriate legal action** pursuant to Articles 78 and 79 of the Regulation.

8. NATURE OF THE PROVISION

The provision of personal data is mandatory for all processing operations whose legal basis is the fulfilment of legal obligations and the execution of the contract: in fact, any refusal of the interested party to provide the necessary information will make it impossible for the Controller to carry out the services requested by the interested party from the Controller.

On the other hand, the provision of personal data is optional for all processing operations whose legal basis is the specific, informed and unequivocal consent of the interested party: any refusal to provide information, even if optional, will make it impossible for the interested party to use the relative services, without this entailing any detrimental consequences. Consent may be withdrawn at any time, without affecting the lawfulness of the processing previously carried out, following the instructions in the "Rights of the Data Subject" paragraph of this notice.

Processing based on legitimate interest is not mandatory and the Data Subject may object to such processing by following the procedures indicated in the paragraph "Rights of the Data Subject" of this information notice, and should the Data Subject object to such processing, his/her data may not be used for that purpose, except in the event that the Data Controller demonstrates the presence of compelling legitimate reasons or the exercise or defense of a right pursuant to Article 21 of the Regulation.

8. UPDATE OF THIS PAGE

The Data Controller reserves the right to periodically update the content of this page. The Data Subject is therefore invited to periodically consult the information contained herein to stay updated with respect to any changes that have occurred since the last consultation