

## PRIVACY POLICY FOR PARTICIPANTS IN SURVEYS AND MARKET RESEARCHES

*Last update and effective date: Aprile 2023*

Pursuant to articles 13 and 14 of Regulation (EU) 2016/679 (the "**Regulation**"), we wish to inform the participants in the surveys or market researches organized by the Sisal group (the "**Data Subjects**" and the "**Researches**") about the purposes and methods of the processing of their personal data, their scope of communication, as well as the nature of their provision, in relation to such Researches.

### 1. **Data Controller and Data Protection Officer**

The Data Controller differs according to the scope of the Research. Particularly:

- for Researches relating to national tote number games, MySisal, on the organization, exercise and collection of lawful gaming through entertainment machines, betting on forecasting contests and bets, both in physical and online channels, the Data Controller is **Sisal Italia S.p.A.**;
- for Researches concerning sustainability and governance issues of the Sisal group, the Data Controller is **Sisal S.p.A.**.

All the aforementioned companies have their registered office in 20159 Milan, Via Ugo Bassi 6, can be contacted at [privacy\\_sisal@legalmail.it](mailto:privacy_sisal@legalmail.it) and have appointed a Data Protection Officer, also known as "DPO". The DPO can be contacted at the following email address: [dpo@sisal.it](mailto:dpo@sisal.it).

### 2. **Source of the data processed and purpose and legal basis of the processing**

The personal data being processed are acquired by the Data Controller directly from the Data Subject (also automatically in the event that appropriate tracking tools to identify the Data Subject are implemented on the IT systems used to manage the Researches) at the time of participation in the Researches by part of the same, also through third parties specifically appointed for this, or by third parties (e.g. companies that manage external platforms to which the Data Subject registers by making himself available to take part in surveys and panels of third parties and/or of the Data Controller). The data is processed to collect the opinions and suggestions of the Data Subjects regarding topics of interest to the Data Controller, for example to investigate the success of the initiatives organized by the Data Controller for the Data Subjects or verify the correspondence of the services rendered to the needs of the same, improve them or identify new ones, and manage related activities (for example, send the Data Subject thank-you vouchers following participation in the Research). If it is envisaged that data collection takes place through a recorded interview, audio recordings and possibly video recordings are also processed (in which case a specific consent for the use of the image and the relative privacy information are collected/provided). The legal basis of these processing is the legitimate interest of the Data Controller. Where indicated by the Data Subject, the personal data may also concern other subjects connected to the Data Subject (e.g., family members, etc.).

### 3. **Categories of personal data processed and methods of processing**

The data of the Data Subject processed by the Data Controller in the context of the Researches are personal data, identification and contact data (e.g. name and surname of the respondent, username, email address, possibly also automatically acquired by the Data Controller through specific tracking tools implemented on information systems used for the management of Research for the purpose of identifying the Data Subject unequivocally), audio recordings (if the Research provides for the recording of the interview) and data that may be inferred from the answers provided directly by the Data Subject to the Data Controller during Research (e.g. opinions, habits, economic situation, etc.). The processing of such data takes place using manual, IT and telematic tools, with logic strictly related to the purposes highlighted above and, in any case, in compliance with the precautions, guarantees and necessary measures prescribed by the reference legislation, aimed at ensuring the confidentiality, integrity and availability of data, as well as to avoid damages, whether material or immaterial (e.g. loss of control of personal data or limitation of rights, discrimination, theft or usurpation of identity, financial losses, unauthorized

decryption of pseudonymisation, damage to reputation, loss of confidentiality of personal data protected by professional secrecy or any other significant economic or social damage).

#### **4. Communication and dissemination**

For the pursuit of the aforementioned purposes, the Data Controller may transmit the personal data of the Data Subject to: a) subjects who manage the Research on behalf of the Data Controller, if any; b) subjects who carry out data acquisition, processing and archiving services; c) professional firms or companies in the context of assistance and consultancy relationships; d) other companies of the Group to which the Data Controller belongs, or in any case parent, subsidiary or associated companies, pursuant to art. 2359 of the Italian Civil Code, also located abroad, as part of the existing intra-group agreements for the management of the activities referred to in the aforementioned purposes; and e) entities that provide services for the management of information systems used by the Data Controller. The Data Controller acknowledges that, for the pursuit of the aforementioned purposes, the personal data of the Data Subjects could be communicated to third parties even outside the EU: in this case, the transfer takes place on the basis of appropriate guarantees pursuant to articles 45 et seq. of the Regulation. These subjects operate independently as separate data controllers, or as data processors appointed for this purpose by the Data Controller. The updated list of third parties to whom the data is communicated is available by forwarding a request to [privacy\\_sisal@legalmail.it](mailto:privacy_sisal@legalmail.it). The data may also be known, in relation to the performance of the assigned tasks, by the personnel of the Data Controller, specifically authorized for processing. Personal data, in any case, will not be disseminated.

#### **5. Storage time**

Personal data will be kept by the Data Controller for the time necessary to carry out the Research and, in any case, for a maximum of 12 months from the date of collection. Once these terms have elapsed, the Data Controller will proceed to the automatic cancellation of the data collected, or to their irreversible transformation into anonymous form, and will only process the data in an aggregated way. In case of processing carried out for the management of complaints or grievances, for the exercise of a right in court or to fulfill further obligations established by law, this period may be extended until the end of the management of the complaint or grievance, to the exhaustion of any judicial procedure established or at the end of the obligation established by law.

#### **6. Rights of the Data Subject**

Pursuant to articles 15 to 22, the Regulation gives Data Subjects the possibility to exercise specific rights. In particular, the Data Subject can obtain: a) confirmation of the existence of processing of personal data concerning him/her and, in this case, access to such data; b) rectification of inaccurate personal data and integration of incomplete personal data; c) the cancellation of personal data concerning him/her, in cases where this is permitted by the Regulation; d) the limitation of the processing, in the hypotheses foreseen by the Regulation; e) the communication, to the recipients to whom the personal data have been transmitted, of the requests for rectification/cancellation of personal data and for limitation of processing received from the Data Subject, unless this proves impossible or involves a disproportionate effort; f) the receipt, in a structured format, commonly used and readable by an automatic device, of the personal data provided to the Data Controller, as well as the transmission of the same to another data controller (so-called "data portability"). The Data Subject also has the right to oppose at any time, for legitimate reasons, the processing of personal data concerning him, even if pertinent to the purpose of the collection, except in the case in which the Data Controller demonstrates the presence of prevailing binding legitimate reasons or exercise or defense of a right pursuant to art. 21 of the Regulation. The Data Subject also has the right not to be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or which significantly affects his person in a similar way, unless this decision: a) is necessary for the conclusion or execution of a contract between the Data Subject and the Data Controller; b) is authorized by Union or Member State law to which the Data Controller is subject; c) is based on the explicit consent of the Data Subject. In the cases referred to in the

aforementioned letters a) and c), the Data Subject has the right to obtain human intervention from the Data Controller, to express his opinion and to contest the decision. The Data Subject can submit requests to [privacy\\_sisal@legalmail.it](mailto:privacy_sisal@legalmail.it) indicating in the subject "Privacy - exercise of privacy rights", detailing which right he/she intends to exercise and providing the Data Controller with the information useful for identifying him/her pursuant to articles 11 and 12 of the Regulation. The Data Subject also has the right to lodge a complaint with the supervisory authority, in particular in the Member State in which he habitually resides, works or the place where the alleged violation occurred (e.g. the "Garante per la Protezione dei Dati Personali" in Italy, which can be contacted at the addresses available on the website [www.garanteprivacy.it](http://www.garanteprivacy.it)), as required by art. 77 of the Regulation, as well as to take the appropriate judicial offices pursuant to articles 78 and 79 of the Regulation.

#### **7. Nature and obligation of the provision**

Participation in Research by the Data Subject is optional, but requires the provision of personal data. Any refusal by the Data Subject to provide the necessary information will make it impossible to participate in the Research. The Data Subject may in any case oppose this processing in the manner indicated in the paragraph "Rights of the Data Subject" of this information. If the Data Subject opposes this processing, his data cannot be used, except in the case in which the Data Controller demonstrates the presence of prevailing binding legitimate reasons or for the exercise or defense of a right pursuant to art. 21 of the Regulation.

#### **8. Updating of this document**

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