

PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

Registration for the Azzu&horses private launch list

Notice provided pursuant to Article 13 of Regulation (EU) 2016/679 ("GDPR") and the applicable national legislation on the protection of personal data.

1. Data Controller

The Data Controller is Maria Carmen Vitobello, domiciled for the purposes of this Privacy Notice at Foro Buonaparte no. 59, 20121 Milan (MI), Italy.

The Data Controller may be contacted for any information concerning the processing of personal data and for the exercise of data subjects' rights at the following email address:

info@azzuandhorses.com

2. Categories of personal data collected

The Data Controller collects exclusively the personal data voluntarily provided by the data subject through the registration form for the Azzu&horses private launch list.

- email address;
- country of residence.

The Data Controller does not collect, through the registration form, special categories of personal data pursuant to Article 9 GDPR, nor personal data relating to criminal convictions and offences pursuant to Article 10 GDPR.

3. Purposes of the processing

The personal data collected will be processed for the following purposes:

- to enable registration for the Azzu&horses private launch list;
- to send email communications concerning the Azzu&horses project, its development, the launch of the brand and its products, collections, initiatives and project news;
- to allow subscribers to receive advance information, private communications and any benefits or surprises connected with the first Azzu&horses launch;
- to analyse, including through aggregated statistical processing, the geographical origin of subscribers;
- to plan the commercial launch, future informational and promotional activities, product availability and the organisation of markets and geographical areas of interest.

The country of residence will not be used to make individual decisions concerning the data subject, but exclusively for the organisational, statistical and commercial purposes described above.

4. Legal basis for the processing

The legal basis for the processing is the data subject's consent pursuant to Article 6(1)(a) GDPR.

Consent is given by the data subject through a positive and voluntary action consisting of selecting the relevant checkbox in the form and subsequently submitting the registration request.

Consent may be withdrawn at any time, without affecting the lawfulness of processing carried out before its withdrawal.

5. Nature of the provision of personal data

The provision of the email address and country of residence is voluntary, since the data subject is free to decide whether to register for the private launch list.

However, once the data subject chooses to register, providing both items of information is necessary to complete the registration.

Failure to provide either the email address or the country of residence will therefore make it impossible to complete registration for the private launch list and to receive the related communications.

6. Methods of processing

Personal data will be processed using electronic and telematic means in accordance with the principles of lawfulness, fairness, transparency, relevance and data minimisation.

The Data Controller will adopt appropriate technical and organisational measures to protect personal data against unauthorised access, loss, destruction, disclosure, alteration or unlawful use.

The data will not be used for solely automated decision-making processes that produce legal effects concerning the data subject or similarly significantly affect them.

7. Sending of communications

Communications will be sent to the email address provided by the data subject in the registration form.

Each communication will contain, either directly or through an easily accessible link, a simple and free method for withdrawing consent and stopping further communications.

Consent may also be withdrawn at any time by writing to:

info@azzuandhorses.com

8. Recipients of personal data

Personal data may be processed, to the extent strictly necessary, by persons authorised by the Data Controller and appropriately instructed.

Personal data may also be disclosed to external parties providing services necessary for managing the private launch list and sending communications, including:

- IT service and technical support providers;
- hosting and cloud service providers;
- providers of platforms used to manage forms, mailing lists and newsletters;
- providers and consultants responsible for the development and maintenance of the website;
- professional advisers assisting the Data Controller with legal, technical and organisational obligations.

Where such parties process personal data on behalf of the Data Controller, they will be appointed as processors pursuant to Article 28 GDPR.

Personal data will not be publicly disclosed or transferred to third parties for their own independent promotional purposes unless the data subject has given specific and separate consent.

9. Transfers of personal data outside the European Economic Area

Some IT, cloud, hosting or communications service providers may be established, or may use infrastructure located, outside the European Economic Area.

In such cases, transfers of personal data will take place in compliance with Articles 44 et seq. GDPR and, in particular, on the basis of:

- an adequacy decision adopted by the European Commission;
- standard contractual clauses approved by the European Commission;
- other safeguards provided for under applicable legislation.

The data subject may request further information regarding the safeguards applied by writing to **info@azzuandhorses.com**.

10. Retention period

Personal data will be retained until consent is withdrawn or the data subject requests deletion.

The Data Controller will periodically verify whether subscribers remain interested and will delete or anonymise data that is no longer necessary for the purposes for which it was collected.

If consent is withdrawn or deletion is requested, the data will be removed from the systems used to send communications, except where limited retention is strictly necessary to:

- document the withdrawal of consent;
- manage any disputes;
- comply with legal obligations;
- establish, exercise or defend legal claims.

11. Rights of the data subject

The data subject may exercise at any time the rights provided for in Articles 15 et seq. GDPR and, in particular, may request:

- confirmation as to whether or not personal data concerning them is being processed;
- access to their personal data;
- rectification of inaccurate data or completion of incomplete data;
- erasure of personal data where provided for by law;
- restriction of processing;
- data portability, where applicable;
- the right to object to processing, where applicable;
- withdrawal of consent at any time.

Requests may be sent to:

info@azzuandhorses.com

The Data Controller will respond within the time limits provided for by applicable legislation.

12. Right to lodge a complaint

If the data subject considers that the processing of their personal data infringes applicable data protection legislation, they may lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali) pursuant to Article 77 GDPR, or seek a judicial remedy before the competent courts.

13. Amendments to this Privacy Notice

The Data Controller reserves the right to amend or update this Privacy Notice, including as a result of changes in legislation, the development of the Azzu&horses project or the adoption of new technical tools.

The updated version will be published on the website or otherwise made available to data subjects through appropriate means.

Last updated: August 2026