

Privacy policy – Orbin Invest LP

Orbin Invest LP, Registration: SL031806 with registered office at 9/5 Granton Crescent, Edinburgh, Scotland, EH5 1BN, United Kingdom (hereinafter, the "**Data Owner**"), owner of this website (hereinafter, the "**Site**"), as **owner of the treatment of the personal data** of users who browse and participate in the initiative on the Site (hereinafter, the "**Users**") provides below the privacy information pursuant to art. 13 of EU Regulation 2016/679 of 27 April 2016 (hereinafter, the "**Regulation**") and art. 13 of the Data Protection Act 2018 (hereinafter, jointly with the Regulation, "**Applicable Law**").

The Owner, established outside the European Union, offering a service to subjects residing in the European Union, will process the personal data of users who browse and participate in the initiative on the Site pursuant to art. 3, par. 2 lett. a) of the Regulation.

The initiative is reserved for individuals who have completed eighteen years of age. Therefore, the Data Controller does not collect personal data relating to persons under the age of 18. Upon request by the Users, the Data Controller will promptly cancel all personal data involuntarily collected and relating to persons under the age of 18.

The Owner takes the utmost account of the right to privacy and the protection of personal data of its Users. For any information in relation to this privacy statement, Users can **contact the Owner** at any time, using the following methods:

- ❓ By sending a registered letter with return receipt to the Data Controller's registered office (9/5 Granton Crescent, Edinburgh, Scotland, EH5 1BN, United Kingdom)
- ❓ By sending an e-mail message to: privacy@orbinhub.com

The Data Controller has not identified the figure of the Data Protection Officer (RPD or DPO), as he is not subject to the designation obligation set forth in art. 37 of the Regulation.

1. Purpose of the treatment

Users' personal data will be processed lawfully by the Data Controller pursuant to art. 6 of the Regulation for the following processing purposes:

- a. **Contractual obligations and provision of the service** : to implement the regulation of the prize event, which is accepted by the User during registration; fulfill specific User requests. The User's data collected by the Data Controller for the purpose of possible participation include: name, surname, date of birth, address, house number, city, postal code, e-mail, telephone number, as well as all personal information of the 'User possibly and voluntarily provided. Unless the User gives the Owner a specific and optional consent to the processing of their data for marketing purposes or for the purpose of communicating data to the Owner's Partners pursuant to article 2 below, the above data will be used by the Owner at the exclusive purpose of ascertaining the identity of the User (also by validating the e-mail address), thus avoiding possible scams or abuses and contacting the User for service reasons only (e.g. managing any participation by the User at the prize event, notify any winnings and manage the phase of attribution and delivery of prizes; contact the User to obtain additional data and information - such as a copy of the identity document - possibly requested by the notary and by the Chamber of Commerce official in charge of the competitions prizes, in order to ascertain their identity and avoid scams and abuses; make any urgent communications by telephone in phase d withdrawal and use of prizes). Without prejudice to the provisions elsewhere in this privacy statement, in no case will the Data Controller make the Users' personal data accessible to other Users.;
- b. **Administrative-accounting purposes** : i.e. to carry out activities of an organisational, administrative, financial and accounting nature, such as internal organizational activities and functional activities for the fulfillment of contractual and pre-contractual obligations;
- c. **Legal obligations** : or to fulfill obligations established by law, by a regulation or by European legislation (e.g. legislation on tax matters; legislation on prize events - Presidential Decree 430/2001).

The provision of personal data for the processing purposes indicated above is optional but necessary, since failure to provide them will make it impossible for the User to use the services offered by the Data Controller and participate in the prize event.

The personal data that are necessary for the pursuit of the processing purposes described in this article 1 are indicated with an asterisk within the initiative registration form.

2. Further processing purposes

2.1. Marketing (sending of advertising material, direct sales and commercial communication)

With the **free and optional consent of the** User, some personal data of the User (name, surname, date of birth, address, house number, city, zip code, e-mail, telephone number) may be processed by the Data Controller also for marketing purposes (sending of advertising material, direct sales and commercial communication), or so that the Data Controller can contact the User by post, e-mail, telephone (landline and/or mobile, with automated call or call with and/or without the intervention of an operator) and/or SMS and/or other messaging systems, to offer the User the purchase of products and/or services offered by the Owner and/or by third-party companies, present offers, promotions and commercial opportunities.

Profiling

The User's personal data (i.e. personal and contact details, and information relating to the services in which the User has expressed an interest) may also be processed by the Data Controller for profiling purposes, i.e. to reconstruct the User's tastes and consumption habits, identifying the User's consumer profile, in order to be able to send the User commercial offers consistent with the identified profile.

If consent is not given, the possibility of registering on the Site will not be affected in any way.

In the event of consent, the User may revoke it at any time by making a request to the Data Controller sending an email at privacy@orbinhub.com

User ID verification

The Controller informs that, in the pursuit of its legitimate interest, the User's personal data (i.e. personal and contact details) may also be processed by the Controller for security purposes, i.e. to verify the User's digital identity and to prevent fraud and abuse of personal data.

The User may at any time object to this processing by making a request to the Data Controller sending an email at privacy@orbinhub.com

In case of lack of consent, the possibility of registering for the initiative will not be affected in any way.

In case of consent, the User may revoke it at any time, making a request to the Data Controller in the manner indicated in the following article "Rights of the interested parties" .

The User can also easily oppose further sending of promotional communications via e-mail by clicking on the appropriate link for the withdrawal of consent, which is present in each promotional e-mail. If the User intends to revoke his consent to the sending of promotional communications by telephone, while continuing to receive promotional communications by e-mail, or vice versa, please send a request to the Data Controller in the manner indicated in the following article "Rights of Interested" .

The Data Controller informs that, following the exercise of the right to object to the sending of promotional communications via e-mail, it is possible that, for technical and operational reasons (e.g. formation of contact lists already completed shortly before receipt by of the Holder of the opposition request) the User continues to receive some further promotional messages. If the User should continue to receive promotional messages after 24 hours have passed from exercising the right to object, please report the problem to the Owner, using the contacts indicated in the following article "Rights of the interested parties" .

2.2. Communication of data to the Owner's Partners

With the User's **free and optional consent** , the User's personal data (name, surname, date of birth, address, house number, city, zip code, e-mail, telephone number and IP address) will be communicated from the Owner to the following categories of third-party companies:

- (i) landline and mobile phone companies;
- (ii) companies active in the publishing world (printed paper, internet, television and new media); (iii) companies active in the sector of electronic commerce of products and services;
- (iv) companies operating in the energy sector;
- (v) companies operating in the travel and leisure sector;
- (vi) companies involved in professional and/or educational training;
- (vii) advertising agencies, media centers and contact centres;
- (viii) companies operating in the food sector; (ix) NGOs and ONLUS;
- (x) companies operating in the financial and insurance sector

(xi) companies operating in the marketing and web communication sector.(collectively ,the “Partners of the Owner”).

We and our website sponsors, partners and selected third parties operate in the following areas:

Retail , Automotive, Lifestyle, Charity, Utility, Telecommunications, Insurance, Publishing / Media,
Entertainment/Gaming/Leisure, Public Sector, Financial Services, Travel, Mail Order, Health/Beauty, Education, FMCG,
Marketing Agencies and Brokers, Property, Pharmaceuticals, Claims Companies and Short Term Loans.

We may share your personal information with our partners and their global partners for the purposes of:

Fraud Prevention - preventing others from misusing your personal information. This may involve identity verification for anti-fraud, anti-money laundering, anti-crime, asset recovery, debt collection and reuniting individuals with unclaimed assets; and

Digital Advertising - providing personalised advertising and content that is relevant to you. This may involve identity resolution for data analysis, matching and linkage.

We use suitable safeguards to transfer your data to third countries such as standard contractual clauses and adequacy decisions to protect your rights. If you would like to receive a copy of our safety measures, you can contact us via email.

These categories include third-party companies that have requested to be explicitly indicated as Partners of the Owner’s websites/domains.

The Owner's Partners, as independent data processors, will process the User's personal data for their own marketing purposes (direct sales, sending advertising material and commercial communication), and may contact the User by post, e-mail, telephone (fixed and/or mobile, with automated call or call communication systems with and/or without the intervention of an operator) and/or SMS and/or MMS to offer the User the purchase of products and/ or services offered by the same categories of third-party companies and/or by other companies and presenting offers, promotions and commercial opportunities to the User. Once the transfer has taken place, it will be the responsibility of the Owner's Partner (except for cases in which the Partner is included in the above list and has already made its own information available there), to provide Users pursuant to art. 14 c. 3 of the Regulation, all the information required by

the same art. 14 of the Regulation.

In case of lack of consent, the possibility of registering for the Initiative will not be affected in any way.

In case of consent, the User may revoke it at any time, making a request to the Data Controller in the manner indicated in the following article "Rights of the interested parties" . **Furthermore, it is possible to analytically select for which Partners you intend to give your consent to the transfer of your personal data when registering for the competition.**

The Owner informs that the User's personal data will be processed by the Owner's Partners as **independent data processors**, on the basis of the specific information that will be issued by the Owner's Partners to Users. Any requests not to receive further commercial communications from the Data Controller's Partners, to whom the data have already been communicated by the Data Controller, must therefore be addressed directly to them.

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We share your data or derivatives of your data with third party independent data controllers and processors, including resellers and distributors, for the purposes of identity verification. These third parties provide identity verification services, such as the verification and/or validation of the identity of individuals for the purposes of, but not limited to, anti-money laundering regulations, age verification, anti-fraud processes and pre-employment checks.

3. Marketing Services Providers

We will share your data with the Marketing Services Providers listed below, who will use it for a variety of direct marketing, testing, research & product development purposes. Marketing Services Providers carry out data profiling. They will combine your data with data they get from other sources (including public sources) and use it to create “predictive models”. Marketing Services Providers use these models to try to predict behaviour and preferences (e.g. how likely you are to buy a holiday online or take a particular type of holiday) or likely circumstances (e.g. whether you are eligible for a particular credit card).

Marketing Services Providers will also try to match and then link your data with data that they receive about you from other sources, to make sure that the data they hold about you is correct.

For example, they might do this to

- check whether you have recently moved address; or
- keep the IP address they hold about you up to date. IP addresses change regularly. The IP address they receive from us might change too quickly to make the data you provide through us useful for marketing purposes. Marketing Services Providers might find it helpful for this to be refreshed from time to time to ensure marketing messages are being delivered to the correct consumers, on the correct device(s).

They share your data, including the profiled data they have created about you, primarily to:

- help organisations better understand the likely characteristics of their customers (and find others like them);
- improve the relevancy and appropriateness of an organisation's marketing to its customers (e.g. offers, its products and services); and
- help them communicate with their customers more effectively offline and online. This may mean that you receive tailored advertising via direct mail or when you visit a website.

To understand more about the use of your data by Marketing Services Providers, and to find out how to exercise your data protection rights in relation to their use of your data (including how to opt-out), please click through to the websites of the companies below:

In sharing your data with Marketing Services Providers, we rely on a lawful ground called 'legitimate interest', as our business depends on our ability to partner with third parties who process personal data for marketing-related reasons.

4. Legal bases of the treatment

Contractual obligations and provision of the Service (as described in par. 1, letter a)): the legal basis consists in the art. 6, article 1, lett. b) of the Regulation, i.e. the processing is necessary for the execution of a contract of which the User is a party or for the execution of pre-contractual measures adopted at the request of the same.

Administrative-accounting purposes (as described in the previous article 1, letter b)): the legal basis consists in art. 6, article 1, lett.

b) of the Regulation, as the processing is necessary for the execution of a contract and/or for the execution of pre-contractual measures adopted at the request of the User.

obligations (as described in the previous article 1, letter c)): the legal basis consists in the art. 6, article 1, lett. c) of the Regulation, as the processing is necessary to fulfill a legal obligation to which the Data Controller is subject.

Further processing purposes : for the processing relating to *marketing activities* and the transfer of data to third party Partners of the Data Controller (as described in the previous par. 2.1 and 2.2), the legal basis consists in the art. 6, article 1, lett. a) of the Regulation, or the provision by the data subject of consent to the processing of their personal data for one or more specific purposes. For this reason, the Data Controller asks the User for a specific free and optional consent, to pursue this processing purpose.

5. Processing methods and data storage times

The Data Controller will process Users' personal data using manual and IT tools, with logic strictly related to the purposes themselves and, in any case, in order to guarantee the security and confidentiality of the data.

Users' personal data will be kept for the time strictly necessary to carry out the primary purposes connected with the User's participation in the competition and illustrated in article 1 above, or in any case for the time necessary for the protection in civil law of the interests of both Users and of the Owner.

In the case referred to in article 2 above, the Users' personal data will be kept for the time strictly necessary to carry out the purposes described therein and, in any case, until the User revokes his consent. In the case referred to in article 2.1 above, in particular, the Users' personal data will be kept by the Data Controller for the time strictly necessary to carry out the purposes described therein and, in any case, for no more than, respectively, thirty-six (36) months from the time of collection and/or receipt of such data. In the case referred to in article 2.2 above, the data retention period by the Partners can be found by **the** User within **the** information provided by the latter .

6. Scope of communication and dissemination of data

Users' personal data may be transferred outside the European Union and, in this case, the Owner it will make sure that the transfer takes place in compliance with the Applicable Regulations and, in particular, in compliance with the articles 45 (Transfer based on an adequacy decision) and 46 (Transfer subject to adequate guarantees) of the Regulation. In particular, with reference to the data processing carried out by the Data Controller, operating outside the Union, it should be noted that this involves a transfer carried out on the basis of an adequacy decision, on the basis of the **"Implementing Regulation (EU) 2021/1772 of the Commission of 28**

June 2021 pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council on the adequate protection of personal data by the United Kingdom".

The employees and/or collaborators of the Data Controller in charge of managing the Initiative may become aware of the Users' personal data. These subjects, who have been instructed to do so by the Data Controller pursuant to article 29 of the Regulation, will process the User's data exclusively for the purposes indicated in this information and in compliance with the provisions of the Applicable Regulations.

The personal data of Users may also be disclosed to third parties who may process personal data on behalf of the Data Controller as "Data **Processors** ", such as, by way of example, IT and logistics service providers functional to the Initiative's operations , *outsourcing or cloud computing service providers* , professionals and consultants.

Users have the right to obtain a list of any data processors appointed by the Data Controller, by making a request to the Data Controller in the manner indicated in the following article "Rights of the interested parties".

Furthermore, the Users' personal data may be communicated by the Data Controller, to the extent that this is necessary to execute contractual obligations and/or to comply with legal obligations, **to independent third party data** controllers, such as notaries and chamber of commerce officials in charge of identification of the winners of the competition, the Ministry of Economic Development, as well as the third parties indicated in the regulation of the competition, to whom the data must necessarily be communicated to allow the User to take advantage of any prizes won.

7. Rights of interested parties

Users will be able to exercise the rights guaranteed to them by the Applicable Regulations by contacting the Owner in the following ways:

- 📧 By sending a registered letter with return receipt to the Data Controller's registered office (Orbin Invest LP, Registration: SL031806 with registered office at 9/5 Granton Crescent, Edinburgh, Scotland, EH5 1BN, United Kingdom)
- 📧 By sending an e-mail message to: privacy@orbinhub.com

Pursuant to the Applicable Regulations, the Data Controller informs that Users have the right to obtain indication (i) of the origin of personal data; (ii) the purposes and methods of processing; (iii) of the logic applied in case of treatment carried out with the aid of electronic instruments; (iv) of the identification details of the owner and managers; (v) of the subjects or categories of subjects to whom the personal data may be communicated or who can learn about them as managers or agents.

Furthermore, Users have the right to obtain:

- a) **access , updating , rectification** or, when interested, **integration** of data;
- b) the **cancellation , transformation into anonymous form or blocking** of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;

c) the attestation that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except in the case in which this fulfillment is proves impossible or involves the use of means manifestly disproportionate to the protected right.

Furthermore, Users have:

a) the right to **withdraw consent** at any time, if the treatment is based on their consent;

b) where possible, the right to **data portability** (right to receive all personal data concerning them in a structured format, commonly used and readable by an automatic device), the right to **limitation of the processing** of personal data and the **right to erasure** ("right to be forgotten");

c) the **right to object** :

i) in whole or in part, for legitimate reasons, to the processing of personal data concerning them, even if pertinent to the purpose of the collection;

ii) in whole or in part, to the processing of personal data concerning them for the purpose of sending advertising materials or direct sales or for carrying out market research or commercial communication;

iii) if personal data are processed for direct marketing purposes, at any time, to the processing of their data carried out for this purpose, including profiling insofar as it is connected to such direct marketing.

8. CHANGES TO THIS PRIVACY POLICY

We may make changes to this privacy policy from time to time. You should check this page regularly to see our most up to date policy. This privacy policy was last updated 02 January 2024.

The Owner is not responsible for updating all the links that can be viewed in this Information, therefore whenever a link is not functional and/or updated, Users acknowledge and accept that they must always refer to the document and/or section of the websites referred to by this link.