



THE CHORUS LIFE APPLICATION PRIVACY POLICY

1. WHO IS THE DATA CONTROLLER?

Chorus Life SpA with offices in 24121 Bergamo, Via Teodoro Frizzoni 17, Business Register – Tax Code – VAT no. 02162710160, Bergamo REA (Economic and Administrative Index) no. 267795, and COSTIM Srl with offices in Via Madonna della Neve, 27 – 24121 Bergamo VAT no. 04392130169 are joint Data Controllers of the data processing ('Joint Data Controllers') of the personal data of users ('Users') who download the Chorus Life application ('Application'), complete the registration procedure and use the services also available through the Application at the smart city Chorus Life ('Places'). To this end, Chorus Life SpA and COSTIM have concluded a joint ownership agreement. The essential content of this agreement is available to the User upon request, which can be sent via email to the address info@chorus.life.

In compliance with the provisions of Regulation (EU) 2016/679 ('Regulation'), the Joint Data Controllers provide Users with the following information.

2. FOR WHAT PURPOSES IS THE DATA PROCESSED?

The personal data collected by the Application and/or communicated by the User is processed for the following purposes:

- A.** to allow Chorus Life to fulfil its obligations under the law;
- B.** allow the User to use the Application, create their own account, log in using social log-in systems and use the services available therein. In the first phase, the Application will have an essentially informational and testing purpose (for which no registration is required). In particular, Users will be able to book access to a physical space called 'GSM LAB' in order to test the functions of the Application and the services that will be offered at Chorus Life Places. Based on this experience, the Joint Data Controllers will collect useful information to verify the correct functioning of the Application and to make improvements pending the full deployment, which will be available at the official opening of the Chorus Life Places;
- C.** allow the Joint Data Controllers to contact Users to request opinions, evaluations and carry out surveys regarding the functioning of the Application and the functions and services present therein;
- D.** allow the Joint Data Controllers to contact Users in the future (i.e., with the opening of the Chorus Life Places) for commercial purposes (including, for example, communications relating to the Chorus Life project and the products and services offered by Chorus Life SpA, by COSTIM, or by third parties (including other group companies) as part of the Chorus Life experience, and for market research and surveys other than the communications referred to in letter C. above, by email or by notifications through the Application.

Regarding the processing for commercial purposes mentioned in point D. and the personalisation of the User experience mentioned in point E., the Joint Data Controllers inform that such processing will be implemented when Chorus Life Places is opened to the public or in the period immediately preceding that. In any case, as of now the User is free to grant or not grant the authorisation for such processing.

Furthermore, in the case of any corporate-level events (sale of the company or business branches), due diligence, or in the event of the defence of a right in court, and in relation to the related preliminary activities, Chorus Life SpA and COSTIM Srl could proceed to further processing related to corporate operations or legal proceedings.

3. WHAT DATA IS PROCESSED?

When the User browses the Application, their usage data is collected (which includes, among other things, the IP address, the screens used, the time spent on the screens, the duration of the sessions, the recording of the reaction to engagement activities following the visit to the GSM Lab) and, in the event that the User registers with the Application, some identification

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data is also collected, which includes their name and surname, email address, postal code and the date of birth. The date of birth is requested to allow the Joint Data Controllers to adapt their initiatives where there may be restrictions due to age. If the User intends to use the wayfinding service, the data relating to the User's position is collected, at the express request of the latter and only for the duration of the guided tour of the GSM Lab. If the User decides to reply to the communications referred to in letter C above, the information included in the related replies is also processed. Where the User has given consent, the User's email address is also processed for sending commercial communications. Where the User has given consent for the personalisation of the Chorus Life experience, further information relating to the use of the Application and the use of the services in Chorus Life Places is processed.

In the case of access to the App via social login, the Joint Data Controllers will be aware of the fact that the User has an account with a specific third-party provider (e.g. Apple, Google, Microsoft). No other information is transmitted to the Joint Data Controllers by the third-party provider as a result of using this function.

For information on the processing of personal data collected through cookies, please consult the Cookies Policy.

4. ON WHAT BASIS IS THE DATA PROCESSED?

Without prejudice to the processing of personal data for the purposes referred to in paragraph 2 letter A, which is based on legal obligations to which the Joint Data Controllers are subject, the provision of personal data by the User for the purposes referred to in paragraph 2, letter B (use of the Application, registration of an account and use of the related services) and letter C (request for opinions, evaluations and carrying out surveys) is performed based on a contract with the User and/or the performance of pre-contractual measures (the terms of use of the Application, and also in consideration of this first phase prior to the official opening of the Chorus Life Places). Any refusal to provide data for this purpose will make it impossible for the Joint Data Controllers to allow access to the GSM Lab and to use functions that are subject to registration and therefore requested by the User.

The provision of personal data by the User for the purposes referred to in paragraph 2, letters D and E (commercial communications and evaluation of the User's tastes, preferences, interests and habits) is optional, and the Joint Data Controllers will only be able to process personal data for these purposes with the prior consent of the User. If the User does not intend to consent to the processing of their personal data for these purposes, the Joint Data Controllers will not be able to send commercial communications to the User or personalise the User's experience. Any consent given by the User for one or more of the purposes referred to in the aforementioned paragraph can be revoked at any time. Failure to provide this consent will not have any consequence on access to the GSM Lab and on the provision of the services of the Joint Data Controllers within the scope of the purposes referred to in paragraph 2, letters B and C. The Joint Data Controllers may, in any case where necessary, directly contact the User for purposes of a contractual nature or based on the legitimate interest of the Joint Data Controllers.

Without prejudice to the foregoing, the Joint Data Controllers may in any case use the email address provided by the User when registering for the Application in order to send the latter commercial communications relating to products and any services similar to those purchased or used on the Application. The User has the right to oppose this processing at any time, including through the unsubscribe mechanism present in all the emails that will be sent to them for this purpose.

The User's personal data could also be processed based on the legitimate interest of Chorus Life SpA or of COSTIM Srl for carrying out corporate transactions or the management/exercise of their rights, for example in the context of any corporate-level events (sale of the company or company branches), due diligence, in the case of defence of a right in court and in connection with the related preliminary activities.

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5. HOW WILL THE DATA BE PROCESSED?

In relation to the aforementioned purposes, the data processing will take place mainly with the aid of electronic tools and in some small measure through paper support, but in any case, with tools suitable for guaranteeing security and confidentiality.

6. WHO IS THE DATA COMMUNICATED TO?

Personal data collected by the Application and/or communicated by Users will be processed by persons authorised for processing within Chorus Life SpA and COSTIM Srl, and may be communicated only and exclusively for the purposes indicated and, where necessary, to the following categories of subjects:

- IT service and platform providers (for example, third-party platforms to allow the User to book a visit to the 'GSM Lab' space or to carry out surveys, or the Microsoft Azure AD B2C authentication service which is used for all types of required authentication)
- developers and consultants for the Joint Data Controllers, for example, in the IT, legal, fiscal and tax fields
- group companies, for example Elmet Srl

Where required by law, the data could also be communicated to the competent judicial authorities, public administrations and supervisory and oversight authorities.

The User's personal data will not be disclosed.

With reference to the personal data communicated to them, the subjects belonging to the categories listed above may operate, depending on the case, as Data Processors (and in this case they will receive appropriate instructions from the Joint Data Controllers) or as separate Data Controllers. In the latter arrangement, personal data will be communicated only with the express consent of the Data Subjects, except in cases where the communication is mandatory or necessary by law or for the pursuit of purposes for which the consent of the interested data subject is not required by law.

7. IS THE DATA TRANSFERRED ABROAD?

The Joint Data Controllers do not transfer the User's personal data to third countries. Transfers of Data outside the European Economic Area are subject to a special regime pursuant to the Regulation, and can only be carried out with countries that ensure an adequate level of personal data protection, based on an adequacy decision of the Commission or where adequate safeguards have been adopted (including the standard contractual conditions envisaged by the European Commission), and provided that data subjects have enforceable rights and effective remedies.

In the event that the Joint Data Controllers or their suppliers should transfer the User's personal data to third countries, this will only be undertaken in accordance with the above requirements.

8. HOW LONG WILL MY PERSONAL DATA BE RETAINED?

The personal data collected will be retained in compliance with the provisions of current legislation on the subject for a period not exceeding that necessary to achieve the purposes for which it is processed. The criteria for determining the retention period of personal data take into account the permitted processing period and the applicable regulations regarding the limitation of legitimate rights and interests where they constitute the legal basis of the processing.

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8. HOW LONG WILL MY PERSONAL DATA BE RETAINED?

For example, in the event of an account closure, the Joint Data Controllers will have the right to keep information relating to the User to fulfil legal obligations where applicable (e.g. of a fiscal nature), and to protect themselves in the event of any exercise of rights by part of the User until the end of the applicable limitation period.

With reference to commercial purposes, personal data will be processed until consent is revoked. In any case, in the absence of any interaction between the User and the Joint Data Controllers for a period of 24 months, the latter will discontinue the processing in question. In these circumstances, in the absence of further legal bases (for example the management of the User's registration to the Application), the data will be deleted.

In relation to the personalisation of the Chorus Life experience, the Joint Data Controllers will use the information for a period of 24 months from its collection, without prejudice to the User's right to revoke their consent at any time.

At the end of the retention period, the data will be deleted, anonymised or aggregated in such a way as not to allow the identification of the User.

9. WHAT ARE THE RIGHTS OF THE DATA SUBJECT?

Users may contact the Joint Data Controllers, at any time and free of charge, to:

- obtain confirmation as to whether or not their personal data is being processed and, if so, to obtain access to the information pursuant to Art. 15 of the Regulation, as well as a copy of the personal data being processed
- obtain the correction of inaccurate personal data concerning themselves, or the integration of incomplete personal data, taking into account the purposes of the processing
- obtain the deletion of their personal data in the presence of one of the reasons referred to in Art. 17 of the Regulation
- obtain the limitation of the processing of their personal data, if one of the hypotheses referred to in Art. 18 of the Regulation applies
- oppose the processing of their personal data for reasons connected to their particular position, where applicable, pursuant to Art. 21 of the GDPR
- receive personal data concerning themselves in a structured, commonly used and automatically readable format, and if technically possible, transmit such data to another Data Controller without impediments by the Joint Data Controllers, and within the limits set forth to Art. 20 of the Regulation, in the cases where it is applicable. Furthermore, Users have the right to revoke the consent to the processing of their personal data (where it had been given), at any time, without prejudice to the lawfulness of the processing based on the consent given before the revocation.

The requests related to the exercise of the rights indicated above must be sent by email to the address indicated.

Furthermore, Users have the right to object to the sending of emails for commercial purposes at any time, also through the unsubscribe mechanism that is present in all emails that will be sent to them for such purposes.

Pursuant to the Regulation, the Joint Data Controllers are not authorised to charge costs to fulfil one or more of the requests set out in this paragraph, unless the requests are manifestly unfounded or excessive, and in particular are repetitive in nature.

In cases where the User requests more than one copy of their personal data, or in cases of excessive or unfounded requests, the Joint Data Controllers may (i) charge a reasonable fee, taking into account the administrative costs



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incurred to process the request or (ii) refuse to comply with the request. In these cases, the Joint Data Controllers will inform the User of the costs, before processing the request. CI Joint Data Controllers may request further information before processing the requests if there is a need to verify the identity of the natural person who submitted them.

Without prejudice to any other administrative or judicial appeal, the User also has the right to lodge a complaint with the Data Protection Authority if they believe that the processing concerning them is being done in violation of the General Data Protection Regulation. Further information is available on the website <http://www.garanteprivacy.it>.

The Joint Data Controllers invite the User in all cases to contact the company directly through the channels indicated above before contacting the Supervisory Authority, to facilitate resolving any dispute regarding the protection of personal data amicably and in the shortest possible time.