

1. WHO IS THE DATA CONTROLLER?

Chorus Life S.p.A., with registered office in Viale Vittorio Emanuele II, 10/M, 24121 - Bergamo, - Tax No. - VAT No. 02162710160, Bergamo Companies' Registry No. 267795, is the data controller ("ChorusLife" or "Data Controller") of the personal data of the users ("Users") who access the chorus.life website ("Website") and use the services provided. In accordance with the provisions of Regulation (EU) 2016/679 ("Regulation"), ChorusLife provides Users with the following information.

2. FOR WHAT PURPOSES ARE THE DATA PROCESSED?

Personal data collected through the Website and/or otherwise communicated by the User are processed for the following purposes:

- A. enable ChorusLife to fulfil its obligations under the law;
- B. enable the User to access the Website, sign-up by creating an account and use the services available therein. The purpose of the Website is essentially for providing information on the ChorusLife spaces and on the configuration of the flats available at the ChorusLife spaces and, more generally, on the ChorusLife project;
- C. allow ChorusLife, at the request of the User through a specific contact form, to contact the User in order to respond to the User's requests;
- D. allow ChorusLife to contact Users by e-mail for commercial purposes, i.e. to send information of a commercial nature and updates relating to the initiatives available in the ChorusLife smart district and to ask Users to participate in surveys relating to the ChorusLife smart district;
- E. upon the User's request through a specific form, contact the User, by e-mail or telephone, to provide a personalised service for the configuration and booking of a residence in the ChorusLife smart district.

In addition, in the event of any corporate events (sale of the company or business units), due diligence or in the event of the defence of a right in court and in connection with the related prodromal activities, ChorusLife may proceed with further processing in connection with corporate operations or judicial events.

3. WHAT DATA ARE PROCESSED?

When the User navigates on the Website, the User's usage data are collected (including, among others, the IP address, user name, navigation data such as the pages visited and the time spent on them, session duration) and, if the User fills in one of the the forms that is available on the Website, some identification data are also collected, including the User's name and surname, e-mail address and/or phone number and any personal data voluntarily entered by the User in the contact form. If the User signs-up to the Website, certain identification data are also collected, including his/her first and last name, e-mail address, and date of birth . If the User uses the service called 'Configurator', data on his/her configuration preferences are also collected . For commercial purposes, where consent has been given by the User, the User's e-mail address is also processed for sending commercial communications. If the User decides to respond to the surveys referred to in paragraph 2 above, ChorusLife also processes the information included in the relevant answers. If the User signs up to the Website via social login, ChorusLife will be made aware that the User has an account with a specific third-party provider (e.g. Apple, Google, Microsoft). No other information is transmitted by the third-party provider to Chorus Life as a result of the use of this function.

4. ON WHAT BASIS ARE DATA PROCESSED?

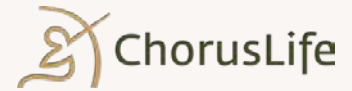
The processing of personal data for the purpose referred to in point A of paragraph 2 is based on legal obligations to which ChorusLife is subject.

The processing of personal data for the purposes referred to in point B of paragraph 2 (use of the Website , signing-up to the Website and enjoyment of its services) is carried out on the basis of an agreement with the User and/or the execution of pre-contractual measures.

The processing of personal data for the purposes referred to in point C of paragraph 2 (contacting the User following the completion of a contact form) is carried out on the basis of the legitimate interest of the Data Controller in following up the User's requests.

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privacy policy



The processing of personal data for the purpose referred to in point D of paragraph 2 is carried out on the basis of the User's consent. Any refusal to provide personal data for these purposes does not affect the User's ability to access the Website and use its services. If the User does not intend to consent to the processing of his or her personal data for this purpose, ChorusLife will not be able to send the User commercial communications and invitations to participate in surveys and the User will not receive such communications and invitations.

Any consent given by the User may be withdrawn at any time by clicking on the unsubscribe button at the bottom of each e-mail.

The processing of personal data for the purpose referred to in point E of paragraph 2 (contacting the User in order to provide a personalised service for the configuration and booking of a residence) is carried out insofar as it is necessary for the purpose to take steps at the request of the User prior to entering into a contract.

The User's personal data may also be processed on the basis of the legitimate interest of ChorusLife in carrying out operations of a corporate nature or in the management/exercise of its rights, for example in the context of possible corporate events (sale of the company or business units), due diligence, in the event of the defence of a right in court and in relation to related prodromal activities.

5. HOW ARE DATA PROCESSED?

In relation to the aforementioned purposes, the data will be processed mainly with the aid of electronic systems and, to a residual extent, on paper, but in all cases with systems that guarantee security and confidentiality.

6. TO WHOM ARE THE DATA COMMUNICATED?

The personal data collected through the Website and/or otherwise communicated by the User will be processed by subjects which are authorized to process the data within ChorusLife and may be communicated solely and exclusively for the purposes indicated and where necessary, to the following categories of subjects: IT service providers, by way of example TECMA Solutions S.p.A.; developers and consultants of ChorusLife, for example, in the IT, legal, tax, fiscal and real estate management fields, by way of example Revalo S.p.A.; group companies such as, by way of example but not limited to, Costim S.r.l. and Elmet S.r.l.

Where required by law, the data may also be disclosed to competent judicial authorities, public administrations and supervisory and control authorities.

The User's personal data will not be disseminated.

With reference to the personal data communicated to them, subjects belonging to the above categories may operate, depending on the case, as data processors (and in this case they will receive appropriate instructions from ChorusLife) or as separate data controllers. In the latter case, personal data will be communicated only with the express consent of the data subjects, except in cases where communication is compulsory or necessary by law or for the pursuit of purposes for which the data subject's consent is not required by law.

7. IS DATA TRANSFERRED ABROAD?

ChorusLife also reserves the right to transfer the User's personal data to third countries. Transfers of data outside the European Economic Area are subject to a special regime under the Regulation, and are only made to countries that ensure an adequate level of protection of personal data, on the basis of an adequacy decision by the European Commission or where adequate safeguards have been adopted (including the standard contractual clauses laid down by the European Commission), provided that the data subjects have enforceable rights and effective remedies.

8. HOW LONG WILL MY PERSONAL DATA BE STORED?

The personal data collected will be stored in accordance with the provisions of the relevant legislation for a period of time not exceeding that necessary to achieve the purposes for which they are processed.

The criteria for determining the period of retention of personal data shall take into account the period of permitted processing and the applicable rules on the limitation of rights and legitimate interests where they form the legal basis of the processing.

With reference to the commercial purpose, personal data will be processed until consent is withdrawn. In any case, if there is no interaction between the User and Chorus Life S.p.A. for a period of 24 months, the latter will stop the processing in question. In such circumstances, in the absence of further legal grounds (for example, the legitimate interest of ChorusLife related to any request for information by the User), the data will be deleted.

At the end of the retention period, the data will be deleted, anonymised or aggregated in such a way that the User cannot be identified.

9. WHAT ARE THE DATA SUBJECT'S RIGHTS?

Users may contact ChorusLife, at any time and free of charge to:

- obtain confirmation as to whether or not their personal data are being processed and, if so, to obtain access to the information referred to in Article 15 of the Regulation, as well as a copy of the personal data being processed;
- obtain the rectification of inaccurate personal data concerning them, or, taking into account the purposes of the processing, the integration of incomplete personal data;
- obtain the erasure of their personal data in the presence of one of the grounds referred to in Article 17 of the Regulation;
- obtain the restriction of the processing of their personal data in the event of one of the cases referred to in Article 18 of the Regulation;
- object to the processing of their personal data on grounds relating to their particular position, where applicable, pursuant to Article 21 of the Regulation;
- receive the personal data concerning them in a structured, commonly used and machine-readable format and transmit such data to another data controller without hindrance, if technically possible, in the cases and within the limits set out in Article 20 of the Regulation, where applicable.

In addition, Users have the right to withdraw their consent to the processing of their personal data (where given), at any time, without prejudice to the lawfulness of the processing based on the consent given before withdrawal.

Requests to exercise the above rights should be sent by e-mail to info@chorus.life.

Pursuant to the Regulation, ChorusLife is not authorised to charge costs for complying with one or more of the requests set out in this paragraph, unless they are manifestly unfounded or excessive, and in particular are repetitive in nature. In cases where the User requests more than one copy of his or her personal data or in cases of excessive or unfounded requests, ChorusLife may (i) charge a reasonable fee, taking into account the administrative costs incurred to process the request or (ii) refuse to comply with the request. In these eventualities, ChorusLife will inform the User of the costs before processing the request. ChorusLife may request additional information prior to processing requests if it needs to verify the identity of the individual making the request.

Without prejudice to any other administrative or jurisdictional action, the User also has the right to lodge a complaint to the Garante per la protezione dei dati personali if he/she considers that the processing concerning him/her is carried out in breach of the General Data Protection Regulation. Further information is available on the website <http://www.garanteprivacy.it>.

ChorusLife, in any event, invites the User to make contact directly through the channels indicated above, before approaching to the Supervisory Authority, in order to resolve amicably and in the shortest possible time any dispute regarding the protection of personal data.