

Privacy Notice

Effective date: October 13, 2026 – Version 1.0

1. Who we are and to whom this Privacy Notice applies

LA STAMPA USA CORP., a corporation organized under the laws of the State of Delaware, United States of America, with its office at 423 E 42nd St., New York, NY 10017, United Nations Foreign Press Office, registration number with the Division of Corporations 42-4917438, is the controller of the personal data (the “Controller”) collected through the website www.lastampausa.com.

This Privacy Notice applies to all visitors to the website, wherever they reside, including residents of the State of Delaware and of the other States of the United States of America, as well as individuals located in the European Economic Area, the United Kingdom and Switzerland.

The information set out in Addenda A, B and C is provided to the extent that the laws referred to therein apply to the processing; its inclusion does not constitute an acknowledgment that the Controller is subject to any particular law.

For any matter relating to the processing of personal data, you may write to privacy@lastampausa.com or to the postal address above, to the attention of the Data Protection Contact.

2. What this website does

The website is a read-only editorial service. It does not require registration, does not allow users to create an account, does not host comments, does not sell anything and does not send commercial communications. We do not collect personal data for marketing purposes and we do not sell personal data.

3. What data we collect

Data you provide to us. If you write to us at the addresses indicated, we collect your name, your email address and the content of your communication, to the extent you choose to provide them.

Online identifiers. The website uses cookies and similar technologies of two types: technical cookies, which are necessary for the operation and security of the website and for recording the user’s cookie choices; and analytics cookies, which are used to monitor use of the website and measure its traffic for statistical purposes. The website does not use profiling or marketing cookies and does not integrate third-party services that profile users. The list of tools used, the entity responsible for each, their duration and the methods for giving, refusing or withdrawing consent, where required by the law applicable to the user’s location, or for objecting to their use, are set out in the Cookie Policy, a document separate from this Privacy Notice, accessible from every page of the website and from the consent management banner.

Data we do not collect. We do not collect special categories of personal data within the meaning of Article 9 of Regulation (EU) 2016/679, data classified as sensitive under U.S. state laws, consumer health data, or precise geolocation. We ask users not to send us data of this kind through our contact channels.

4. Why we process data and on what legal basis

We process data in order to provide the website and keep it running, to measure its traffic and analyze its use for statistical purposes, to keep it secure and prevent abuse and unauthorized access, to respond to the requests you send us, and to comply with the legal obligations to which we are subject.

Providing contact data is optional; failure to provide it only prevents us from responding to your request. Browsing data are acquired automatically by the systems that deliver the website. Refusing or withdrawing consent to analytics cookies, for users from whom such consent is required, and objecting to their use do not in any way affect your ability to browse the website.

For users located in the European Economic Area, the United Kingdom and Switzerland, the legal bases are as follows:

- operation and security of the website: the Controller's legitimate interest in providing a functioning and secure service and in preventing abuse;
- responding to requests sent by the user: the Controller's legitimate interest in following up on the communications received, or the taking of pre-contractual steps at the Data Subject's request;
- compliance with obligations under the law of the European Union or of the Member States: legal obligation;
- establishment, exercise or defense of legal claims: the Controller's legitimate interest;
- statistical analysis of website use through analytics cookies: the Data Subject's consent, given through the consent management banner and revocable at any time.

Obligations arising under U.S. law, since they do not fall within Article 6(3) of Regulation (EU) 2016/679, are pursued on the basis of the Controller's legitimate interest, subject to a documented balancing test.

5. Who we share data with

We share data only with providers acting on our behalf and under our instructions, namely the content delivery provider, the email service provider and the web analytics provider; with professional advisers bound by confidentiality; with public authorities where required by law or necessary to establish, exercise or defend legal claims; and, in the event of extraordinary corporate transactions, with any successor in interest.

The up-to-date list of providers is set out in Annex 3.

We do not sell personal data, we do not share it for cross-context behavioral advertising and we do not process it for targeted advertising, as those terms are defined under applicable U.S. state laws. The web analytics provider processes data solely on our behalf, under an agreement that prohibits it from using the data for its own purposes.

6. International transfers

Data are processed in the United States of America by the content delivery and security provider (Cloudflare, Inc.), on the basis of the standard contractual clauses approved by the European Commission and the provider's self-certification under the EU-U.S. Data Privacy Framework, and in New Zealand, a country covered by a European Commission adequacy decision, by the web analytics provider (InnoCraft, Matomo Cloud). Communications sent to our email addresses are stored on servers located in the European Union.

Where personal data originating in the European Economic Area, the United Kingdom or Switzerland are transferred to a country that does not ensure an adequate level of protection, we adopt at least one of the following safeguards: standard contractual clauses approved by the European Commission, with the related addenda for the United Kingdom and Switzerland; transfer to countries recognized as adequate; the recipient's self-certification under the EU-U.S. Data Privacy Framework and its extensions, used concurrently with, and not as an alternative to, the standard contractual clauses.

A copy of the safeguards adopted may be requested using the contact details in Section 1 of this Privacy Notice.

7. How long we keep data

Communications received at our contact addresses are retained for twenty-four months from the end of the exchange, unless retention is necessary to comply with a legal obligation or to defend a legal claim.

Cookie data are retained for the duration indicated in the Cookie Policy.

Details by category are set out in Annex 1.

8. How we protect data

We adopt technical and organizational measures appropriate to the risk, including encryption of communications between the browser and the website, access controls on our systems, logging of administrative activities and documented selection of providers. No measure can guarantee absolute security: please notify us promptly of any circumstance that leads you to suspect misuse of your data.

9. Children

The website is intended for a general audience and is not directed to children under the age of thirteen.

We do not knowingly collect personal data from children under the age of thirteen, in accordance with the Children's Online Privacy Protection Act (15 U.S.C. §§ 6501-6506) and its implementing regulations (16 C.F.R. Part 312). A parent or guardian who believes that a child has provided us with personal data may write to us using the contact details in Section 1 of this Privacy Notice: we will delete the data within the time limits required by law.

For consumers between thirteen and eighteen years of age, please refer to Section B4-4.

10. Browser signals

We do not sell or share personal data and we do not process it for targeted advertising: accordingly, there is no opt-out that a Global Privacy Control signal, or any other universal opt-out signal, could exercise with respect to our website.

Should we engage in any such activity in the future, we will treat such signals as valid opt-out requests and will disclose this in this Privacy Notice before the processing begins.

We do not collect personally identifiable information about the user's online activities over time and across third-party websites; accordingly, we do not receive or process Do Not Track signals sent by the browser. The web analytics provider collects data through the website solely on our behalf and is not permitted to use it to track the user's activity over time and across different websites.

The foregoing statements are also made pursuant to 6 Del. C. § 1205C(b)(5) and (6) and California Business and Professions Code § 22575(b)(5) and (6).

10.1 Language versions

This Privacy Notice is published in Italian and in English. The two versions have the same content and the same effective date. In the event of any discrepancy between them, the English version prevails for Data Subjects residing in the United States of America and the Italian version prevails for all other Data Subjects. Anyone who notices a discrepancy is invited to report it to us using the contact details in Section 1 of this Privacy Notice: we will align the versions and record this in the version log.

11. Links to third-party websites

The website may contain links to websites operated by third parties. We do not control those websites and are not responsible for their personal data practices. We encourage you to read their privacy notices.

12. Changes to this Privacy Notice

We may amend this Privacy Notice to reflect changes in the law or in our practices. Each version bears its effective date at the top of the document.

Changes do not apply to data already collected in a manner inconsistent with what was stated at the time of collection; for processing based on consent, we will obtain new consent where required by applicable law.

This Privacy Notice is reviewed and, where appropriate, updated at least once every twelve months.

13. How to contact us and how to complain

To exercise the rights granted by applicable law, or for any other request, you may write to privacy@lastampausa.com or to the postal address in Section 1 of this Privacy Notice.

We will respond within the time limits set by the law applicable to the Data Subject's location, as described in Addendum D.

If you are not satisfied with our response, you may contact:

- the Delaware Department of Justice, Consumer Protection Unit, by writing to privacy@delaware.gov or using the complaint form published at attorneygeneral.delaware.gov;
- the supervisory authority of the EU Member State in which you habitually reside, work or where the alleged infringement occurred, pursuant to Article 77 of Regulation (EU) 2016/679. For Italy: Garante per la protezione dei dati personali (Italian Data Protection Authority), Piazza Venezia 11, 00187 Rome, Italy, www.garanteprivacy.it;
- for the United Kingdom, the Controller itself, pursuant to section 164A of the Data Protection Act 2018, by writing to the address in Section 1 of this Privacy Notice with the subject line "Complaint", or the Information Commissioner's Office;
- for Switzerland, the Federal Data Protection and Information Commissioner.

Addendum A. Data Subjects in the European Economic Area, the United Kingdom and Switzerland

This Addendum supplements the Privacy Notice and prevails over it in case of conflict, solely with respect to individuals located in the European Economic Area, the United Kingdom or Switzerland.

A1. Rights

The Data Subject has the right to: obtain confirmation as to whether processing is taking place and access their data; obtain rectification of inaccurate data and completion of incomplete data; obtain erasure of data in the cases provided for by Article 17 of Regulation (EU) 2016/679; obtain restriction of processing in the cases provided for by Article 18; receive their data in a structured, commonly used and machine-readable format and transmit it to another controller, where processing is based on consent or on a contract and is carried out by automated means; object, on grounds relating to their particular situation, to processing based on legitimate interest; withdraw consent at any time, without affecting the lawfulness of processing carried out before its withdrawal.

Where processing is restricted, the data are stored and may be processed only with the Data Subject's consent, for the establishment, exercise or defense of legal claims, for the protection of the rights of another natural or legal person, or for reasons of important public interest.

A2. How and when to exercise rights

Requests may be submitted using the contact details in Section 1 of this Privacy Notice.

For Data Subjects in the European Economic Area and the United Kingdom, we will respond within one month of receipt; this period may be extended by a further two months where necessary, taking into account the complexity or number of requests, in which case we will inform you within the first month.

For Data Subjects in Switzerland, we will respond within thirty days of receipt; if this is not possible, we will inform you within the same period of the date on which we will respond.

Exercising rights is free of charge; in case of manifestly unfounded or excessive requests, we may charge a reasonable fee or refuse to act on the request, giving reasons in writing.

A3. Complaints

The Data Subject may lodge a complaint with the supervisory authority of the Member State of the European Union or of the European Economic Area in which they habitually reside, work or where the alleged infringement occurred, pursuant to Article 77 of Regulation (EU) 2016/679. The list of supervisory authorities is available on the website of the European Data Protection Board (www.edpb.europa.eu).

Data Subjects in the United Kingdom may lodge a complaint directly with the Controller, pursuant to section 164A of the Data Protection Act 2018: we will acknowledge receipt within thirty days and communicate the outcome without undue delay. This is without prejudice to the right to contact the Information Commissioner's Office.

Data Subjects in Switzerland may contact the Federal Data Protection and Information Commissioner.

A4. No automated decision-making

We do not make decisions based solely on automated processing, including profiling, which produce legal effects concerning the Data Subject or similarly significantly affect them.

A5. Cookies

Technical cookies and analytics cookies are used on the website. Technical cookies are placed without consent, as they are strictly necessary to provide the service requested by the user. Analytics cookies are placed only with the user's prior consent, given through the consent management banner displayed

on the first visit. Users may change or withdraw their choices at any time using the dedicated function accessible from every page of the website. The list of tools used and their characteristics are set out in the Cookie Policy.

A6. Transfers

Data collected directly from the Data Subject by the Controller, which is established in the United States, are processed in the country indicated in Section 6 of this Privacy Notice. For flows originating from providers established in the European Economic Area, the United Kingdom or Switzerland, the recipient country and the safeguard adopted are set out in Section 6 of this Privacy Notice.

Addendum B. Residents of the United States of America

This Addendum supplements the Privacy Notice for residents of the States of the United States of America that grant rights with respect to personal data, expressly including residents of the State of Delaware, and prevails over it in case of conflict.

B1. Categories of data, purposes, sources and recipients

- Identifiers, such as IP address and technical and analytics cookie identifiers. Purposes: operation and security of the website; statistical traffic analysis. Source: automatic collection. Recipients: content delivery provider; consent management platform (CMP) provider; web analytics provider.
- Internet or other electronic network activity information, such as pages viewed, date and time of access and referring page. Purposes: statistical traffic analysis and abuse prevention. Source: automatic collection. Recipients: content delivery provider; CMP provider; web analytics provider.
- Contact data, such as name and email address. Purpose: responding to requests. Source: provided by the user. Recipients: email service provider.

The retention periods for each category are set out in Annex 1.

Sources from which we collect personal data: directly from you, when you write to us; automatically from your device and browser, when you browse the website, including through technical and analytics cookies. We do not purchase personal data from data brokers, we do not collect it from publicly available sources and we do not receive data about you from other users.

Business purposes: provision and maintenance of the website; cybersecurity and prevention of fraud and abuse; measurement and statistical analysis of traffic; responding to requests received; compliance with legal obligations; establishment, exercise and defense of legal claims.

Analytics cookies. For residents of the United States of America, analytics cookies are used without prior consent, following the notice provided in this Privacy Notice and in the Cookie Policy. The web analytics provider acts solely on our behalf, as a service provider (or processor) under applicable state laws, and is not permitted to use the data for its own purposes: their use therefore does not constitute a sale or sharing of personal data, nor processing for targeted advertising. You may in any case disable analytics cookies at any time using the preference management function accessible from every page of the website or through your browser settings, without any effect on your ability to browse the website.

B2. Express negative statements

As of the effective date of this Privacy Notice, and as confirmed by a technical scan of the website:

- we do not sell personal data and we do not share it for cross-context behavioral advertising;
- we do not process personal data for targeted advertising;
- we do not process sensitive personal data in a manner that gives rise to a right to limit its use;
- we do not engage in profiling in furtherance of automated decisions that produce legal or similarly significant effects;
- we do not collect, use or sell personal data for the purpose of training large language models. This statement is also made pursuant to Conn. Gen. Stat. § 42-520, as amended by Public Act No. 25-113;
- we do not disclose personal data to third parties for direct marketing purposes.

Should any of these circumstances change, we will update this Privacy Notice before beginning the new processing and will give notice as provided in Section 12 of this Privacy Notice.

1. List of third parties

Residents of States that grant this right, including Minnesota and Oregon and, within the limits provided therein, Connecticut and Delaware, may request the list of the specific third parties to which we have disclosed their personal data, or the list of the categories of third parties, as provided by the relevant state law.

The up-to-date list of our providers is in any event set out in Annex 3 and may be consulted without the need for a request.

B3. Consumer rights

Depending on your State of residence, you may have the right to: confirm whether we process your data and access it; correct inaccurate data; obtain deletion; obtain a copy of your data in a portable format; obtain the list of the categories of third parties to which your data have been disclosed; where provided by state law, obtain the list of the specific third parties; opt out of the sale of data, targeted advertising and certain forms of profiling; and not be discriminated against for exercising these rights.

B4. How to exercise your rights

Requests should be sent to privacy@lastampausa.com or to the postal address in Section 1 of this Privacy Notice. We will verify the requester's identity by replying to the email address provided and, where necessary, by requesting further information proportionate to the nature of the request. We will respond within forty-five days of receipt; this period may be extended by a further forty-five days where justified, in which case we will notify you within the initial period.

You may use an authorized agent: in that case, a written and signed authorization must be submitted together with the request, and we may contact you directly for verification.

If we deny your request, you may appeal as described in Section B4-5.

B5. Residents of the State of Delaware

Residents of the State of Delaware may file a complaint with the Delaware Department of Justice, Consumer Protection Unit, by writing to privacy@delaware.gov or using the complaint form published at attorneygeneral.delaware.gov. This Privacy Notice is also provided pursuant to Chapter 12C of Title 6 of the Delaware Code and, to the extent applicable, the Delaware Personal Data Privacy Act.

1. Categories of information collected and categories of third parties

The categories of personally identifiable information that we collect through the website are those indicated in Section 3 of this Privacy Notice and in Section B1 of Addendum B. The categories of third parties with whom we may share it are: the content delivery service provider; the email service provider; the web analytics provider; professional advisers bound by confidentiality; public authorities, where required by law; and any successor in interest in the event of extraordinary corporate transactions. We do not share personally identifiable information with advertising networks, data brokers or profiling service providers.

2. Review and modification of information

You may request to review the personally identifiable information collected through the website and to have it modified by writing to privacy@lastampausa.com. We will respond within forty-five days of receipt of the request, after verifying your identity by replying to the address provided. A response is provided free of charge once every twelve months; for further requests within the same period we may charge a reasonable administrative fee, which will be communicated to you before we act on the request.

3. Do Not Track signals and third-party collection

We do not collect personally identifiable information about the user's online activities over time and across third-party websites; accordingly, we do not receive or process Do Not Track signals sent by the browser.

The web analytics provider collects data through the website solely on our behalf and is not permitted to use it to track the user's activity over time and across different websites.

4. Rights of Delaware residents

The rights described in this Addendum B apply to all residents of the United States of America, expressly including residents of the State of Delaware. In particular, Delaware residents have the right to: confirm whether we process their personal data and access it; correct inaccuracies; obtain deletion of personal data provided by, or obtained about, them; obtain a copy of their data in a portable and readily usable format; obtain the list of the categories of third parties to which we have disclosed their personal data; and opt out of the sale of personal data, processing for targeted advertising, and profiling in furtherance of automated decisions that produce legal or similarly significant effects.

We do not sell personal data and we do not process personal data for targeted advertising. We do not process sensitive data within the meaning of 6 Del. C. § 12D-102. In any event, we will not sell personal data or process it for targeted advertising with respect to consumers whom we know, or willfully disregard, to be between thirteen and eighteen years of age, without their consent.

5. Appeal and complaint

If we deny a request in whole or in part, you may appeal by writing to privacy@lastampausa.com with the subject line "Appeal". We will provide a written, reasoned response within forty-five days of receipt of the appeal, describing any action taken and the reasons for any refusal. This time limit is shorter than the maximum permitted by applicable law and is binding on us on a voluntary basis.

If your appeal is denied, you may file a complaint with the Delaware Department of Justice by writing to privacy@delaware.gov or using the complaint form published at attorneygeneral.delaware.gov.

6. Accessibility and format of the Privacy Notice

This Privacy Notice is written in plain and straightforward language, is made available in the languages ordinarily used in our business and is readable on all devices through which users interact with us, including small-screen devices. We take care to make it accessible to persons with disabilities; users who experience difficulty accessing it may request a version in an alternative format by writing to privacy@lastampausa.com, and we will provide it free of charge and without delay.

7. Security and data breaches

We implement and maintain reasonable procedures and practices to prevent the unauthorized acquisition, use, modification, disclosure or destruction of personal information, in accordance with 6 Del. C. § 12B-100.

In the event of a security breach, we will notify the affected individuals without unreasonable delay and in any event within sixty days of determining that the breach occurred. We will notify the Delaware Attorney General where the number of affected residents exceeds five hundred and, in any event, within sixty days of the determination where, despite the exercise of reasonable diligence, it is not possible to identify the affected residents within that period, as provided by 6 Del. C. § 12B-102.

B6. Residents of the State of California

This section also constitutes the Notice at Collection under California Civil Code § 1798.100(a). The categories of data collected, the purposes, the sources, the recipients and the retention periods are those indicated in Section B1 of Addendum B, in Section 7 of this Privacy Notice and in Annex 1.

We do not sell or share personal data and we do not process sensitive personal data for purposes other than those permitted without a right to limit.

California residents have the right to know, correct and delete their data and not to be discriminated against. Under the law known as “Shine the Light” (California Civil Code § 1798.83), they may also request information about the disclosure of their data to third parties for direct marketing purposes: we make no disclosures of this kind.

The statements in Section 10 of this Privacy Notice and in Section B4-3 of Addendum B, regarding the effective date, changes, Do Not Track signals and third-party collection, are also made pursuant to the California Online Privacy Protection Act, California Business and Professions Code §§ 22575-22579, which applies regardless of size thresholds.

B7. Residents of the State of Washington

We do not collect consumer health data within the meaning of the My Health My Data Act.

Addendum C. Residents of other countries

This Addendum applies to individuals located in countries other than those expressly addressed in Addenda A and B.

C1. General principle

We apply to all visitors to the website, wherever they reside, the same standard of transparency, data minimization and security described in this Privacy Notice. We do not differentiate our processing practices according to the reader’s country of residence.

C2. Rights under local law

Where the law applicable to the Data Subject's location grants rights additional to or different from those described in this Privacy Notice and its Addenda, the Data Subject may exercise them by writing to privacy@lastampausa.com and indicating their country of residence. We will respond in the manner and within the time limits provided by the law applicable to their location and, where that law does not set a time limit, within thirty days of receipt of the request. The foregoing does not constitute an acknowledgment that the Controller is subject to any particular foreign law.

C3. Local representatives

We have not currently appointed representatives in countries other than those, if any, indicated in Section 1 of this Privacy Notice, as the legal requirements for doing so are not met. Should those requirements arise, the appointment will be indicated in this Privacy Notice and notice will be given as provided in Section 12 of this Privacy Notice.

C4. Children

Regardless of the user's country of residence, we do not profile children and we do not process children's data for behavioral advertising. A parent or guardian who believes that a child has provided us with personal data may write to us using the contact details in Section 1 of this Privacy Notice.

C5. Periodic review

We review, at least every six months, the applicability of foreign laws to our processing, taking into account the origin of our traffic and our editorial and business choices. Where circumstances change, we update this Privacy Notice and its Addenda.

Addendum D. Operational handling of requests

This Addendum describes the procedure by which we handle Data Subjects' requests, whatever the law applicable to their location.

D1. How to submit a request

We operate exclusively online and interact with users solely through the website. Requests are submitted by writing to privacy@lastampausa.com and indicating one of the following in the subject line: Access, Correction, Deletion, Portability, Objection, Appeal, Complaint. In the body of the message it is sufficient to indicate your country or State of residence and the address at which you wish to receive our response.

We do not require you to create an account, we do not require identity documents and we do not collect any data beyond what is strictly necessary for verification. If we are unable to link the request to any data in our possession, we will tell you so, giving reasons, rather than asking for additional information.

D2. Identity verification

Verification is carried out by replying to the email address from which the request was sent. For deletion requests and requests for access to specific content, we may ask for an additional verification element, proportionate to the nature of the data and to the risk of disclosure to an unauthorized person. Data obtained solely for verification purposes are not used for any other purpose and are deleted once the request has been handled.

D3. Authorized agents and requests on behalf of others

The Data Subject may appoint an authorized agent. In that case, we ask for a written authorization signed by the Data Subject; a notarized power of attorney constitutes valid authorization but is not required. We may contact the Data Subject directly to confirm the appointment.

A parent or guardian may submit a request on behalf of a minor by providing written authorization and the minor's email address to which the request relates.

D4. Response times

- **United States, States with a comprehensive privacy law:** ordinary period of forty-five days, extendable by a further forty-five days with notice given within the initial period; internal appeal decided within forty-five days of receipt.
- **European Economic Area:** ordinary period of one month, extendable by a further two months with notice given within the first month; there is no internal appeal, but the right to lodge a complaint with the supervisory authority remains.
- **United Kingdom:** ordinary period of one month, extendable by a further two months with notice; complaints to the Controller under section 164A of the Data Protection Act 2018, with acknowledgment of receipt within thirty days and the outcome communicated without undue delay.
- **Switzerland:** response within thirty days of receipt; if this period cannot be met, notice within the same period of the date on which we will respond.
- **Other countries:** the period provided by applicable law and, failing that, thirty days, with any reasoned extension communicated by notice; appeal available on request.

D5. Fees and limits

Responses are free of charge. For U.S. States that allow it, the right to a free response applies once every twelve months; for further requests within the same period we may charge a reasonable administrative fee, which we will communicate before acting on the request and which the Data Subject may decline by withdrawing the request. For Data Subjects in the EU/EEA, the United Kingdom and Switzerland, responses are always free of charge, except in the case of manifestly unfounded or excessive requests, in which case we will give reasons in writing.

D6. Non-discrimination

Exercising your rights will not result in any adverse consequences. We do not restrict access to content, degrade the quality of the service or apply different terms to anyone who has exercised a right or sent an opt-out signal.

D7. Internal register

We keep a register of the requests received, recording the date of receipt, type, outcome, date of response and any appeal. The register is kept as evidence of compliance and is retained for three years. We are not currently required to publish the annual metrics that California law requires of larger businesses; should we exceed the relevant thresholds, we will publish the metrics at www.lastampausa.com/privacy/metriche.

D8. Accessibility

Anyone who has difficulty using the online channel, including for reasons of disability, may request an alternative format or assisted methods by writing to the same address, and we will provide them free of charge and without delay.

Technical Annexes

The Annexes form an integral part of this Privacy Notice and may be updated independently. Each update changes the date shown at the bottom of the relevant Annex, without the need to amend the body of the Privacy Notice, unless the change affects the categories of data or the purposes of processing.

Annex 1. Retention periods

Category of data	Purpose	Period	Criterion
Messages received at our contact addresses	Response and evidence	24 (twenty-four) months from the end of the exchange	Limitation period for any claims
Register of Data Subjects' requests	Evidence of compliance	3 (three) years	Period within which the competent authorities may carry out inspections
Technical cookies	Operation and recording of cookie choices	Duration indicated in the Cookie Policy	Duration indicated in the Cookie Policy
Data collected through analytics cookies	Statistical traffic analysis	Duration indicated in the Cookie Policy	Duration indicated in the Cookie Policy

Date of last update of Annex 1: October 13, 2026

Annex 2. Cookies and tracking technologies

The list of cookies and other tracking technologies used on the website, indicating the entity responsible, the type (technical or analytics), the purpose, the duration and whether consent is required, is set out in the Cookie Policy, to which reference is made in full.

Date of last update of Annex 2: October 13, 2026

Annex 3. Providers processing data on our behalf

Provider	Service	Data processed
Microsoft	Email	Content of communications

Provider	Service	Data processed
Cloudflare, Inc.	Content delivery and security	IP address, technical and browsing data
InnoCraft Ltd (Matomo Cloud)	Web analytics	Analytics cookie identifiers, usage data
Iubenda	Consent Management Platform	Cookie consents

Date of last update of Annex 3: October 13, 2026

Annex 4. Version log

Version	Effective date	Description of change	Prior notice given
1.0	October 13, 2026	First publication	Not applicable