

Privacy Policy of Consorzio del Formaggio Parmigiano Reggiano for the Sweepstakes "The Face of Greatness" ("Sweepstakes") provided pursuant to Article 13 of the General Data Protection Regulation 679/2016 ("Regulation")

1. Who is the Data Controller of Personal Data?

The **Consorzio del Formaggio Parmigiano Reggiano** is the Data Controller of the users' personal data described in this notice, concerning data collected:

- In relation to participation in the Sweepstakes "The Face of Greatness" ("Sweepstakes"). The Sweepstakes is open to those aged 18 and over who are legal residents of the New York Designated Market Area; it is governed by the Official Rules.
- In relation to requests for assistance and customer care services concerning The Sweepstakes.

The identification details and contact information of the Consorzio del Formaggio Parmigiano Reggiano are as follows: Consorzio del Formaggio Parmigiano Reggiano c/o Customer Service Shop Parmigiano Reggiano Via Kennedy 18 – 42124 Reggio Emilia e-mail: CUSTOMERSERVICE@PARMIGIANOREGGIANO.IT telephone: +39 0522 122 122

2. Has the Data Controller appointed a Data Protection Officer (DPO)?

The Consorzio del Formaggio Parmigiano Reggiano has appointed a Data Protection Officer (also referred to as the "DPO"), an independent figure providing assurance, as required by Article 37 of the Regulation. The DPO cooperates with the Personal Data Protection Authority (Garante) and constitutes the point of contact for data subjects regarding issues related to the processing of personal data.

Data subjects may contact the DPO to exercise the rights provided for in Articles 15 to 22 of the Regulation and for any issues they may encounter in the processing of their personal data using the following email address: DPO@PARMIGIANOREGGIANO.IT

3. What personal data is processed, for what purposes is it processed, what is the legal basis that legitimizes the processing, and for how long is it retained?

Sweepstakes Participation and Related Assistance

For the purposes of participating in the Sweepstakes, the Consortium will process the following data: name, surname, participant's selfie, information regarding the participant's residency in the New York Designated Market Area, and that they are at least 18 years old.

The Consortium will also process the following data related to the winner: shipping address, telephone number, proof of identity, and eligibility.

Finally, the Consortium will process any additional data contained in assistance requests relating to the Sweepstakes and in correspondence with the winner.

The legal basis that legitimizes this processing is **Article 6.1, letter b) of the Regulation** (the processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract).

The provision of personal data for the purposes described above is optional: there is no legal or contractual obligation that requires the user to provide the data. However, without the personal data provided during the registration procedure, the Data Controller will not be able to receive the user's registration request and/or subsequently manage the participation in accordance with the Terms of Service and provide assistance in relation to it.

For this purpose, the Consortium will process the user's data for the time strictly necessary for carrying out the individual processing activities and, in any case, within a maximum period of **180 days from the closing of the Sweepstakes**, unless, within that term, the user has submitted requests, reports, or complaints. In this case, the data will be retained until the request, report, or complaint is resolved and for a subsequent period of 12 months.

Establishment, defense, or exercise of a right – personal data collected and processed during participation in the Sweepstakes, including any correspondence exchanged with the participants and/or the winner, will be processed by the Data Controller for the establishment, exercise, or defense of a right in all competent jurisdictions. For example, to respond to disputes relating to the correct execution of the Sweepstakes and the fulfillment of the obligations incumbent on the Data Controller.

The legal basis that legitimizes this processing is **Article 6.1, letter f) of the Regulation** (legitimate interest of the Data Controller). The user has the right to object, at any time, on grounds relating to their particular situation, to the processing of personal data concerning them for this purpose.

Dissemination of the winner's name: A winner list will be made available by the Sponsor 4 weeks after the close of the Sweepstakes, for a period of 8 weeks. It will be available on www.promowinners.com/the-face-of-greatness. The legal basis that legitimizes this processing is **Article 6.1 c) of the Regulation** (compliance with a legal obligation).

4. Who are the recipients of the personal data?

The personal data provided by the user may be communicated by the Consortium to the categories of recipients indicated below. The subjects to whom the Consortium communicates the data act as external data processors appointed by the Consortium through a specific contract (“**Data Processors**”) or as persons authorized to process personal data under the direct authority of the Consortium (“**Authorized Persons**”) or, in the case of third parties used by the Data Processor, as “**Sub-Processors**”, pursuant to Article 28.4 of the Regulation.

Further Information

The users' personal data may be communicated by the Consortium to the following categories of recipients:

- to employees and/or collaborators of the Consortium, for the performance of administrative, accounting, and IT and logistics support activities;
- to companies, consultants, or professionals potentially entrusted with the installation, maintenance, updating, and, in general, the management of the Consortium's hardware and software, including cloud computing service providers and/or Customer Service support providers, and to the third parties they use;
- to companies providing Sweepstakes management services;
- to all those entities, including public authorities, that have access to the data by virtue of regulatory or administrative provisions;

- to all those public and/or private entities, natural and/or legal persons (e.g., legal consultancy firms), if the communication is necessary or functional for the correct fulfillment of the obligations assumed, as well as the obligations deriving from the law, or in the case of the establishment, exercise, or defense of a right.

The list of recipients is available at the Consortium's headquarters.

Please note that:

- In the case of cookies created or made available by third parties, as indicated in the Consortium's Cookie Policy, reachable via the "Cookie Policy" link in the footer, the third-party provider receives the data collected by the cookie and processes it as an independent data controller, for its own purposes. In this case, the processing carried out by the Consortium is therefore supplemented by the processing carried out by third-party providers. Users are therefore invited to consult the privacy policy of each of these providers;
- The Customer Care support service is provided by Zendesk Inc, based in Delaware, USA ("Zendesk"). Zendesk directly accesses communications sent or received by the user who contacts Customer Care by email or by using the form in the "Contacts" section of the Italian e-Shop. Zendesk processes the data contained in these communications, not only as a Data Processor of the Consortium but also as an independent Data Controller, i.e., for its own purposes and on the basis of its own privacy policy. Users are therefore invited to consult Zendesk's privacy policy available at the following address
[HTTPS://WWW.ZENDESK.IT/COMPANY/AGREEMENTS-AND-TERMS/PRIVACY-POLICY//](https://www.zendesk.it/company/agreements-and-terms/privacy-policy/)

5. Can personal data be transferred to Third Countries?

The personal data collected from users may be transferred to Third Countries. Where this occurs, appropriate safeguards will be adopted for the transfer pursuant to Article 46 of the Regulation.

6. What are the Data Subject's rights and who can the data subject contact in case of violation of these rights?

The data subject has the right to obtain from the Data Controller, in the foreseen cases, access to their personal data and the rectification or erasure thereof, or restriction of processing concerning them, or to object to processing (Articles 15 et seq. of the Regulation). The specific request is submitted by contacting the Data Controller, as identified in point 1 above.

The data subject, should they consider that the processing of their personal data violates the provisions of the Regulation, has the right to lodge a complaint with the Data Protection Authority (Garante), as provided for in Article 77 of the Regulation itself, or to appeal to the competent judicial authorities (Article 79 of the Regulation).

Data subjects who wish to avail themselves of this right can find the form for exercising data protection rights at the following link:

<https://www.garanteprivacy.it/home/modulistica-e-servizi-online>.

ADDITIONAL U.S. PRIVACY NOTICE (Website)

This Additional Notice supplements this Privacy Policy for residents of California and other U.S. states with privacy laws (including Virginia, Colorado, Connecticut, and Utah) and applies to personal information collected through our Website.

Categories of personal information collected (last 12 months). Depending on your interactions with the Website, we may collect:

- Identifiers (e.g., IP address, email address, if you voluntarily provide it through forms);
- Internet / electronic activity information (e.g., device and browsing data such as pages visited, time of access, browser type, engagement with our Website and emails);
- Professional or education information (if you voluntarily apply via the “Work with us” section).

We collect this information directly from you (forms, emails) and automatically through your interaction with the Website (cookies, analytics, server logs).

Purposes and disclosures. We use this information to operate the Website, respond to inquiries, manage the Community (if you opt in), process job applications, and improve our services. We disclose personal information only to service providers/processors (e.g., IT hosting, analytics, mailing platforms) acting on our behalf under written contracts.

Sale/Sharing. For Website data, we do not sell or share personal information for monetary consideration or for cross-context behavioral advertising. If this practice changes, we will update this Notice and provide appropriate opt-out mechanisms (including a “Do Not Sell or Share My Personal Information” link, if applicable).

Your U.S. privacy rights. Subject to verification and applicable law, you may have the right to:

- Know/access the personal information we collected about you;
- Delete it;
- Correct inaccuracies;
- Opt out of sale/sharing or targeted advertising (not currently applicable as noted above);
- Not be discriminated against for exercising your privacy rights.

How to exercise these rights (no account required). You may submit requests at no cost by:

1. emailing privacy@parmigianoreggiano.it (subject: “U.S. Privacy Request – Website”), and/or
2. using our web form, if available: [\[insert link to web form\]](#).

You may also call +39 0522 307741. You may call the number at your own expense; charges will apply as for a standard international call from the USA to Italy, according to the user's selected plan and rates. [\[insert toll-free number, if any\]](#). We will not require you to create an account to make a request. We will respond within the timeframes required by law.

Minors. Our Website is not directed to children under 13, and we do not knowingly collect their personal information; if we become aware that we have, we will delete it. We do not knowingly sell/share personal information of consumers aged 13–16; if we ever did, we would first obtain an opt-in authorization (or parental consent if under 13).

Cookies and online tracking. Some Website data is collected via cookies and similar technologies. Under California and other state laws, this may be considered a “sale” or “sharing” of personal information. Please see our Cookie Policy for details and to exercise your rights, including via the “Do Not Sell or Share My Personal Information” link in the Website footer. We also honor browser-based Global Privacy Control (GPC) signals. At this time, our Website does not respond to browser “Do Not Track” (DNT) signals.