

Privacy Policy Skipso platform

The company Epta S.p.a., with registered office at Via Mecenate, n. 86, 20138, Milan, Italy ("**Epta**" or "**we**") is responsible for the processing of your personal data associated with the platform Skipso, created to submit and review ideas, projects, and startups ("**Ideas**") for the purpose of bring innovation, in the context of the project New Ideas Generation (the "**Platform**").

Epta processes your personal data, whether entered by you or otherwise created and processed while using the Platform, in compliance with the Privacy Laws.

Personal data is defined in accordance with the EU Regulation 679/2016 (GDPR) as well as with any other applicable data protection-related law (collectively, the "**Privacy Laws**"), as any data that can identify, directly or indirectly, you or other data subjects.

Although the Platform is not indented to include and store personal data but to provide and manage the Ideas, the latter may include, in very limited cases, personal data.

The following information explains how we treat personal data based on the Terms of Use of the Platform or any other legal basis.

1. Categories of personal data and legal basis

We process the following categories of personal data, based on the following legal basis:

1. Access data, such as IP address and identification data used to verify accesses to your account ("**Log data**"), to ensure appropriate and consistent use of the Platform, and to enable us to intervene in the event of anomalies or system failures.
2. Name, last name, company's role, email address, username and password, as part of the registration process and during your use of the Platform ("**Registration Data**"); and
3. the content of the Ideas, whenever they include personal data, to manage and evaluate the Idea so submitted.

The legal basis legitimising the use of the personal data is the performance of the agreement as per the Terms of Use, within the meaning of and in accordance with Article 6 (1b) of the GDPR, and in accordance with any further local data protection legislation. More specifically, to allow you to use the Platform, participate in the New Ideas Generation Project and update you on the status of the Ideas (follow-up), fulfil the Terms of Use and manage your participation to the New Ideas Generation Project.

2. Retention periods

Unless otherwise required by Privacy Laws, the following general retention periods apply:

- Data provided in point 1.1. above: for 12 months;
- Data provided in point 1.2. above: until the account is kept active by you;
- Data provided under point 1.3. above: until our evaluation process is completed and, in case the relevant Ideas are awarded and implemented, until the relevant process is implemented and put at Go-Live.

Upon expiry of said retention periods, the personal data will be permanently deleted, unless a longer period is required for legal protection purposes and/or for an order by Judicial Authority.

3. Transfer of personal data to third parties

Your personal data will not be disclosed to any third party, except to the other Epta companies part of the Epta Group, if involved in or beneficiaries of the New Ideas Generation Project and to the following categories of recipients, who will be authorised to process your data: technical and administrative staff, IT staff, third parties supplier involved in the provision of the Platform and/or in the maintenance and support for the use of the Platform (e.g., the company Skipso Ltd., with registered address at Twelve Quays House, Egerton Wharf Birkenhead United Kingdom CH41 1LD that, as a software provider carrying out maintenance services as well has been engaged and appointed by us as Data Processor), provided that they guarantee towards us the application of the adequate technical and organizational measures to protect your personal data. With regard to any transfer of data outside the European Economic Area, we will take care to sign from time to time - for those countries whose adequacy is not already recognized by decision of the European Commission (pursuant to art. 45 of the GDPR) - suitable Standard Contractual Clauses (SCC) with the importing companies in such countries (pursuant to art. 46, par. 2, letter c of the GDPR), with the related necessary ancillary measures.

By sending a written request to the email address indicated in paragraph 7 below, you can obtain further details on such transfers.

4. Collected data security

The Processing is carried out via telematic tool (the Platform) with logics strictly related to the purposes themselves and in a way that guarantees the security, confidentiality and respect for the dignity of the data subjects, without using automated decision-making processes, including profiling. We have also implemented

appropriate technical and organizational measures to protect the Personal Data against accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure, or access. These measures provide a level of security appropriate to the risk represented by the Processing and the nature of the Personal Data to be protected.

5. Rights and contacts

You may at any time exercise the rights recognized by Privacy Laws, including:

- The right to access your personal data, as well as the right to receive a copy thereof,
- The right to rectification, if your personal data is incorrect or out of date, which will allow us to fulfill our obligation to have updated personal data concerning you,
- The right to erasure (or right to be forgotten) of your personal data, which may be limited in relation to our contractual or legal obligations;
- The right to the portability of your personal data, or – in some cases where applicable – the right to receive the personal data you have provided to us in a structured and commonly used electronic format, and to transmit them to any other data controller;
- The right to object to processing, under certain conditions, relating to your particular situation;
- The right to request the limitation of the relevant processing, in the cases provided for by the law;
- In cases where the processing is based on consent, the right to withdraw consent at any time without prejudice to the lawfulness of the processing based on the consent given before the withdrawal;
- The right to lodge a complaint with the Data Protection Authority regarding the Processing of your Personal Data.

In this respect, you can send an e-mail to compliance@eptarefrigeration.com or you can contact us at the address Epta SpA, via Mecenate, 86, 20138, Milan, Italy.

6. Change to the Privacy Policy

This Privacy Policy may need to be updated from time to time. We therefore reserve the right to amend or supplement this Privacy Policy as necessary, by submitting to you the updated version of the Privacy Notice.

The Cookie Policy of the Platform is available at <https://www.eptarefrigeration.com/en/cookiepolicy>.

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