

NeoLogistics Privacy Policy

Introduction

This Privacy Policy provides information on how NeoLogistics (hereinafter “we/us/our”) concerns your personal and non-personal data if you visit our website, neologistics.it, if we collect data from you as an advertiser or a publisher, and/or if you are a user of our advertisers’ or publishers’ websites and platforms.

1. Data Protection Officer

Should you have any questions about our data protection measures, the processing of your data, or the protection of your rights as a data subject, you can contact our Data Protection Officer: stock@neologistics.it

2. Definitions

2.1 Personal data

“Personal data” means any information relating to an identified or identifiable natural person. An identifiable natural person can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

2.2 Technical data

“**Technical data**” means any information that cannot be related to your identity, e.g., information on browser types, operating systems, domain names, access dates and times, referring website addresses, online transactions, and browsing and search activity.

2.3 Processing

“Processing” means any operation or set of operations performed on data such as the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction of said data.

3. Collecting and processing personal data

The scope of how we collect and process your personal and non-personal data or other information depends on the way you interact with us or our technologies and services:

- As a visitor of neologistics.it
- As a publisher or an advertiser of the NeoLogistics
- As a user of our publishers' and/or advertisers' websites

With this Privacy Policy, we want to inform you of which information we receive and use at every stage.

We use personal data only to administer and provide our technologies and services. We store personal and any other kind of data strictly in compliance with applicable data protection and privacy legislation and our contractual duties and will prevent unauthorized access to data to the best of our abilities.

3. for visitor of NeoLogistics websites

If you visit the NeoLogistics website, we log the following data to facilitate the use of our website and to ensure its security and the stability of our web servers:

- The IP address of the requesting device
- The date and time of your visit
- The data specifications of your browser and operating system
- The website you were referred from to our website (a so-called Referrer URL).

This information is stored in a log file until it is automatically deleted.

Cookies

We use cookies to improve and optimize the usability of our website. Cookies do not cause damage to your device or contain viruses, trojans, or other malicious software. The cookie stores data linked to the respective device used. This does not mean, however, that we store personal data about you or are aware of your identity.

Our website can be visited and surfed without cookies. Most browsers automatically accept cookies. You can alter the security settings of your web browser in order to stop your device from receiving and storing cookies, to allow cookies to be received and stored from only selected websites, or to be notified before receiving cookies. Please note, however, that these settings may have negative effects on website usability and

user guidance features and other online services. You can delete cookies stored in your browser at any time. Data stored in such cookies will be removed from your device.

You can learn more about the cookies used on our website here (Cookies Policy).

Social plugins and analytics tools

Social plugins

NeoLogistics participates in and markets via social media networks and has implemented certain social media plugins and links to social networks on our websites.

These social networks are operated exclusively by third parties. If you follow the links, data may be transferred to these providers.

All social media plugins are used so that you can interact with us using social network features.

When you enter a page on our website that contains a social network plugin, your browser or app will establish a direct connection to the social network's servers.

NeoLogistics website connects to the following social media networks:

Facebook, see <https://www.facebook.com/policy.php>

YouTube, see <https://www.youtube.com/yt/about/policies/#community-guidelines>

Telegram, see <https://telegram.org/privacy>

Twitter, see <https://twitter.com/en/privacy>

LinkedIn, see <https://www.linkedin.com/legal/privacy-policy>

TikTok, see <https://www.tiktok.com/legal/privacy-policy?lang=en>

Disqus, see <https://help.disqus.com/en/articles/1717103-disqus-privacy-policy>

This processing of (personal) data is necessary for our legitimate interests (i.e., marketing by increasing the range of our website/services).

Analytics tools

We use Google Analytics, Microsoft Clarity, and Yandex.Metrica tools on our website for the purposes of the adequate design and continuous optimization of our website, as well as reporting on website usage.

You can learn more about how they use your data and find out how to opt out here (Cookies Policy).

Personal data in the “contact details” form.

For the purpose of receiving feedback or any questions you may have, we may collect data about you that may include:

- Email address
- Name
- Include any additional data that you might have in an email or comment. You provide this data to us by using the “Contact us” form or by the email you send.

4. Newsletters

With the following information, we will inform you of the contents of our newsletter and the procedure for the registration and dissemination of newsletters, and the evaluation of statistics thereof, as well as your right to object to the procedure. By subscribing to our newsletter, you agree to the receipt of the newsletter and the procedures described.

We send out newsletters, emails, and other electronic notifications with promotional information (hereinafter “Newsletter”) subject to the recipient’s consent or legal permission.

Registering for our newsletter is handled through a so-called double opt-in procedure, which means you will receive an email after you register, in which you will be asked to confirm your registration once again. Registrations for the newsletter are recorded to prove adherence to the precise registration process according to legal requirements. This includes storing the time of logon and confirmation. The newsletters can be sent by NeoLogistic.

To register for the newsletter, we only need your email address. Any other voluntarily provided information about you is only used to personalize the newsletter. You can change the personal data you share with us at any time.

5. Legal Basis

The processing of your personal data relies on the following legal bases:

Your consent, if you have given us such consent

The initiation or execution of a contract with you
The fulfillment of legal obligations The implementation of our legitimate interests .

6. Data protection and transmission to third parties

NeoLogistics takes all technical and organizational security measures required to protect your personal data from loss, unauthorized disclosure, or other forms of misuse. Data is stored in a safe environment that is not open to public access. Your personal data may be encrypted before transmission in certain cases (e.g., processing your login data). This means that communication between your device and our servers will include recognized encryption measures if your browser supports doing so.

Our staff has been trained in privacy matters and responsibly handling personal data and information to which they gain access.

Please be aware that should you contact us via email, the confidentiality of the information therein may not be ensured. Third persons may have access to the contents of emails.

For NeoLogistics to execute its business processes in a convenient and optimal manner, it may be necessary for certain data to be processed by trusted third parties and reliable partners. These third parties may:

- Process payments
- Fulfill orders
- Send emails
- Manage communications (e.g., newsletters, security notifications, chat, etc.)
- Host websites
- Conduct other related activities

on behalf of NeoLogistics. However, NeoLogistics only shares data that is needed to serve the specific purpose for which the third parties are engaged. NeoLogistics ensures that these third parties are under similar obligations to maintain privacy and confidentiality as NeoLogistics's own employees and that they will handle your information in the way and to the extent NeoLogistics is permitted to. NeoLogistics does not allow any third party to use your information for any purposes for which the information was not collected.

NeoLogistics will only disclose your personally identifiable information (PII) outside the country you live in if it is necessary for the intended purpose of processing. However, as a member of the worldwide NeoLogistics group of companies, each local NeoLogistics entity may maintain or perform data processing operations in countries outside the European Economic Area (EEA) or in countries without an adequate level of data protection if doing so is required for the fulfillment of our obligations or the underlying

contract with you. Furthermore, subcontractors of NeoLogistics, which NeoLogistics engages to act on its behalf concerning the processing of your PII, may be domiciled in such areas.

To secure the transfer and processing of PII, NeoLogistics has implemented and requested the required technical and organizational measures and has entered into the appropriate contractual frameworks with NeoLogistics Group companies and subcontractors, which ensure that the data recipient has implemented an adequate level of data privacy in its organization. This includes the signing of Data Processing Agreements and European Union standard contractual clauses issued by the EU Commission. These precautions are appropriate safeguards ensuring that your information will be treated securely, confidentially, and under the applicable data protection laws.

If NeoLogistics is acquired by or merges with a third party, we reserve the right, in either of these circumstances, to transfer or assign the information we have collected from you as part of such a merger, acquisition, sale, or other change of control. In the unlikely event of our bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, we may not be able to control how your information is treated, transferred, or used.

7. Data Transfer

We only transfer personal data to third countries where we can ensure the careful handling of personal data by employing contractual agreements or other suitable guarantees, such as certifications or proven compliance with international security standards.

8. User Rights

You have the following rights concerning our processing of your personal data:

- The right to access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability

- The right to object (on grounds related to your particular situation) if your personal data is processed based on our legitimate interest
- The right to withdraw your consent at any time in the event of any consent-based processing of your personal data without affecting the lawfulness of processing said data based on consent before your withdrawal
- The right to lodge a complaint with a supervisory authority.

You may exercise your legal rights by contacting us via email at stock@neologistics.it.

If you are registered as a publisher or an advertiser on our website, you may access your account and correct or delete some of your data by yourself.

While observing applicable privacy legislation, we will erase your data without any action required by you if retention of your data is no longer necessary for the purpose pursued or retention is no longer allowed for any legal reason. We may restrict processing instead of erasing your data where it is legally not allowed to erase (e.g., legal obligations to maintain your personal data).

9. Amendments

We may modify this Privacy Policy and our data security provisions at any time, particularly if new laws and/or regulations need to be adopted or if we regard amendments as reasonable.

10. Questions/Contacts

For all questions and requests related to the security of your personal data, please contact our Privacy Officers and us at stock@neologistics.it.