### PRIVACY POLICY & COOKIE POLICY

GEICO SPA, in compliance with applicable laws on data protection, provides this privacy policy to its users (the "**Users**") so that they may provide a free and informed consent to the processing of their personal data with respect to all services offered by GEICO SPA through its website <a href="https://www.geicotaikisha.com">www.geicotaikisha.com</a> (the "**Site**").

"<u>Processing</u>" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

"Personal Data" means any information relating to an identified or identifiable natural person, 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.

This policy does not, however, refer to sites which are not owned by GEICO SPA and which may be eventually accessed through links placed on GEICO SPA sites. As a matter of fact, GEICO SPA has no control over these other sites and therefore disclaims any liability with regard to the processing of personal data of users that will be carried out through such sites.

This policy may be subject to changes due to amendments to applicable laws and technological advances eventually occurred. In such case, updated versions will be given wide publicity on the Site.

#### Index

- 1. Who is the data controller of the Users' personal data?
- 2. Which categories of data will be processed?
  - a. Navigation data
  - b. Data voluntarily provided
  - c. Cookies e similar technologies
- 3. For what purposes are the data processed? What is the legal basis of their processing?
- 4. To whom may the data be disclosed?
- 5. Where might the data be transferred?
- 6. How long is the retention period of the data?
- 7. Which rights do you have?
- 8. Amendments
  - 1. Who is the data controller of the Users' personal data?

The Data Controller is Geico S.p.A., P.IVA 00688580968, with registered office in Cinisello Balsamo, 20092, Via Pelizza da Volpedo 109/111.

Tel. 02 660221,

E-mail infoprivacy@geicotaikisha.com.

## 2. Which categories of data will be processed?

## a) Navigation data

The IT systems of the Site collect certain Personal Data whose transmission is implicit in the communication protocols of the Internet. This information is not collected in order to be associated with you, but by their very nature, could be used to identify you through processing and association with data held by third parties. Among these there are IP addresses or domain names of the devices used to connect to the Site, the URI addresses (Uniform Resource Identifier) of the resources requested, the time of request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the answer given by the server (successful, error, etc.) and other parameters relating to the operating system and computer environment.

These data are processed for the purpose of obtaining anonymous statistical information on the Site's usage and to check its correct functioning; to allow – having systems architecture used – the proper delivery of various features you requested, for security reasons and to ascertain responsibility in case of hypothetical computer crimes against the Site or third parties and are deleted after 7 days.

### b) Data voluntarily provided

Through the Site you have the opportunity to voluntarily provide Personal Data such as your name and email address in order to contact GEICO SPA through the section "contact us". GEICO SPA will process these data in compliance with applicable law on data protection, assuming that these Data are related to you or to third parties who you have been authorized to provide the same on an appropriate legal basis that justifies the processing. In such case, you will act as an independent data controller, undertaking all the obligations and responsibilities provided by applicable law. Therefore, you undertake to hold us harmless from any dispute, claim, damages request from the processing activity, etc. that may be received by GEICO SPA from third parties whose Personal Data have been processed through your use of the Site in violation of applicable laws on data protection.

Specific information will be progressively reported or displayed on the Site's web pages dedicated to particular services on request.

### c) Cookies e similar technologies

No personal user data of the Users is acquired by the Site in this case.

We do not use cookies to transmit personal information, and we do not use the so called persistent cookies of any kind, or any system which shall trace users.

The use of the so called session cookies (which are not stored permanently on the user's computer and disappear when the browser is closed) is strictly limited to transmitting session identifiers (consisting of random numbers generated by the server) necessary to allow safe and efficient exploration of the Site.

The so called session cookies used in this site avoid using other techniques potentially prejudicial for the confidentiality of navigation and do not allow the acquisition of personal identification data of the user.

# 3. For what purposes are the data processed? What is the legal basis of their processing?

Personal Data you provide through the Site will be processed by GEICO SPA for the following purposes:

- a) to answer to your requests;
- b) to conduct researches/statistical analysis on aggregate or anonymized data, to avoid the identification of the user, in order to check the Site's functioning, measure the traffic volume and evaluate usage and interest;
- c) to comply with a legal obligation to which GEICO SPA is subject;
- d) to assess, exercise or defend a legal right or whenever the judicial authorities should exercise their judicial offices;

The legal basis of the processing of Personal Data for the purposes at point a) above is the provision of a service or the answer to a request that does not require the consent in accordance with applicable laws on data protection.

The purposes of point b) does not involve the processing of Personal Data, while the purposes referred to in paragraph d) represents a lawful processing of Personal Data in accordance with applicable laws on data protection because, once having provided the Personal Data processing is indeed necessary to fulfil a legal obligation that GEICO SPA is subject to.

The provision of your Personal Data for the purposes listed above is optional, but the objection to provide the same Data could make it impossible to answer a request or to fulfill a legal obligation that GEICO SPA is subject to.

## 4. To whom may the data be disclosed?

Your Personal Data may be disclosed for the purposes specified in paragraph 3 above to:

- a) entities necessary to provide the services offered by the Site including but not limited to sending e-mails and analyzing the functionality of the Site, which typically act as data processors of GEICO SPA;
- b) Individuals authorized from GEICO SPA to process Personal Data who are committed to confidentiality or have adopted an adequate legal obligation of confidentiality (i.e. employees and collaborators of GEICO SPA);
- c) judicial authorities in compliance with applicable laws on data protection.

# 5. Where might the data be transferred?

Some of your Personal Data may be transferred to third parties who may be outside the European Economic Area. GEICO SPA ensures that electronic and paper processing of your Personal Data by such parties takes place in compliance with applicable laws on data protection. More information on the possible transfer of your Data may be found by writing an e-mail to infoprivacy@geicotaikisha.com

## 6. How long is the retention period of the data?

GEICO SPA retains your Personal Data only for the time strictly necessary to achieve the purposes set out in paragraph 3 above.

Notwithstanding the foregoing, GEICO SPA will process your Personal Data until the time allowed by Italian applicable law to protect its own interests. Learn more about the period of retention of your Personal Data and the criteria used to determine this period by writing an e-mail to infoprivacy@geicotaikisha.com.

## 7. Which rights do you have?

In this section you may find the rights you shall exercise in any moment and free of charge by submitting a request to infoprivacy@geicotaikisha.com.

In any moment, the data subject shall have the right to:

- obtain confirmation from the Company on whether or not there is an ongoing processing of his/her Personal Data and, if so, to obtain access to the Data according to section 15 of the Regulation;
- obtain rectification of his/her Personal Data which are inaccurate, as well as obtain the completion of the same Data;
- obtain the erasure of the Data, according to art. 17 of the Regulation, where applicable;
- restrict the processing of his/her Personal Data for their particular position;
- object to the processing of his/her Personal Data for particular reasons, where applicable;
- receive the Personal Data in a structured, commonly used and machine-readable format and have the right to transmit those Data to another controller, according to art. 20 of the Regulation.

Depending on the amount or complexity of the information requested, an appropriate fee may be asked by the Company to comply with such requests.

Without prejudice to any other administrative or judicial appeal, you will also have the right to claim to authority (for Italy: the authority for the protection of personal data), if you believe that any processing is carried out in breach of the Regulation. More information are available on the website <a href="http://www.garanteprivacy.it">http://www.garanteprivacy.it</a>.

### 8. Amendments

GEICO SPA reserves the right to amend or to simply update the contents of this privacy policy, partially or completely, even in case of modification of the applicable laws on data protection. GEICO SPA invites you to visit this section regularly to acknowledge the most recent and updated version of the privacy policy.

Last update 25/05/2018

