

Privacy Policy

Travel is an amazing sport

This Privacy Policy describes how Ferrero Trading Lux S.A, in its capacity of Data Controller (hereinafter, the "**Company**" or "**Controller**" or "**Ferrero**"), with registered office in Luxembourg, Route de Trèves 16, 2633 Senningerberg Niederanven, processes personal data of those who participate to the contest Travel is an amazing sport (hereinafter "**Travel is an amazing sport**") through a dedicated platform (hereinafter, the "**Platform**").

Participation in the contest Travel is an amazing sport is governed by the Terms & Conditions available on the contest's dedicated Platform.

Any information and data provided, or which is otherwise gathered by Ferrero in the context of the participation to the contest Travel is an amazing sport, will be processed by Ferrero in strict confidentiality and in accordance with the applicable legislation, including Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the "**GDPR**").

Ferrero has appointed a Data Protection Officer (**DPO**). For any information regarding the processing of personal data by Ferrero, including a list of its data processors, please contact: privacy@ferrero.com

1. Personal data processed

The participant may provide some personal information when registering to the Platform in order to receive the reward. Ferrero will not send any marketing communication. The following personal data will be requested and processed by Ferrero:

- First and last name;
- E-mail address;
- Date of birth

Hereinafter, commonly defined as "**Personal Data**".

2. Purposes and legal basis of processing

Ferrero collects and processes Personal Data for the participation to the contest Travel is an amazing sport.

Personal Data provided by participants will be used exclusively for the following purposes:

a) pre-contractual and contractual obligations, as well as to manage the contest Travel is an amazing sport and to ensure its correct and regular execution in accordance with the regulations and the Terms & Conditions governing it (e.g., list of subjects entitled to participate, respect of the guidelines provided for uploading the receipts, etc.);

b) administrative-accounting purposes as well as for the performance of organizational, administrative, financial or accounting activities, such as internal activities functional to the fulfillment of contractual and pre-contractual obligations;

The legal basis for the processing of Personal Data for the pursuit of these purposes is the execution and the proper management of the contract and the participation in the contest Travel is an amazing sport pursuant to Art. 6, par. 1, lett. b) GDPR.

c) legal obligations, or to fulfill obligations established by law, by a regulation or by national and European legislation (e.g., tax legislation);

The legal basis of the processing of the Data processed for this purpose is the fulfilment of obligations provided for by law and applicable regulations pursuant to Art. 6, par. 1, lett. c) GDPR.

d) handling of disputes in the event of non-compliance, breaches, legal claims and/or transactions;

e) to prevent and detect any misuse or any fraudulent activities carried out through the website.

The legal basis for the processing of Personal Data for the purposes described is the pursuit of a legitimate interest of the Company and/or third parties (e.g., in the case of disputes) pursuant to Art. 6, par. 1, lett. f) GDPR.

3. Nature of the provision of Personal Data and consequences of any refusal

The provision of Personal Data for the aforementioned purposes, is voluntary. However, failure to provide the Personal Data will make it impossible to participate in the contest Travel is an amazing sport.

4. Third Parties and Data Transfer

Personal Data provided or collected will be processed by properly trained personnel. Ferrero may also request its service providers to perform some data processing operations on its behalf, according to the instructions provided by the same and in line with this Privacy Policy.

Specifically, Personal Data may be communicated, within the limits strictly relevant to the obligations, tasks and purposes referred to the contest Travel is an amazing sport and in compliance with current legislation, to the following categories of subjects:

- a) Partners (natural and / or legal persons) who provide services to the activities of the Data Controller for the management of the Platform;
- b) selected individuals authorized by Ferrero to process Personal Data needed to carry out activities strictly related to the provision of the services through the website (e.g. technical maintenance of network equipment and electronic communications networks), who have undertaken an obligation of confidentiality or are subject to an appropriate legal obligation of confidentiality (e.g., employees of Ferrero);
- c) other companies within the Ferrero Group for internal administrative purposes;
- d) public entities, bodies or authorities, in accordance with the applicable law or binding orders.

Personal Data may be transferred to countries within and outside the European Economic Area, in particular in all the countries where the Data Controller has a legal entity belonging to the group. For transfers from EU to countries not considered adequate by the European Commission, the Company has put in place appropriate and suitable safeguards to protect Personal Data. Accordingly, Personal Data will be transferred in compliance with the requirements and the obligations provided by applicable data protection laws, such as standard contractual clauses adopted by the European Commission.

5. Retention

Personal Data will be stored for a limited time, *i.e.* for one year. At the end of this period, all Personal Data will be permanently deleted from all Ferrero's servers

6. Children

The contest Travel is an amazing sport is not intended for minors (as defined by the national legislation) who did not obtain the consent of their legal representative.

7. Rights

In relation to the processing activities described in this Privacy Policy, data subjects can exercise the following rights:

- a) obtain confirmation of the existence of their personal data and gain access to them (right to access);
- b) obtain the updating, modification and/or rectification of their personal data (right to rectification);
- b) request the deletion, anonymisation or restriction of the processing of Personal Data processed (right to be forgotten and right to the restriction of processing);
- c) object in whole or in part, on legitimate grounds, to the processing of the Personal Data (right to object);
- d) to withdraw the consent to the processing of the Personal Data (if and to the extent such a consent is necessary);
- e) receive a copy of the Personal Data in a machine-readable format (right to data portability); and
- f) the right to lodge a complaint with the Belgian Supervisory Authority at <https://www.gegevensbeschermingsautoriteit.be/burger/acties/klacht-indienen>.

To exercise all the rights identified above, simply contact the Data Controller by sending an e-mail to privacy@ferrero.com.