## **SOCIAL MEDIA POLICY**

Information regarding the use of our Fan Pages and the notice on the processing of personal data pursuant to Articles 13 and 14 of EU Regulation 2016/679 on the protection and processing of personal data (GDPR) for corporate social media pages

# **Preamble**

We thank you for joining our communities. Marazzi Group S.r.l., a sole shareholder company (hereinafter "Marazzi") wishes to draw your attention to the risks you may incur by submitting personal data, photographs, videos, images and/or comments on the Fan Pages.

Please take a few moments to read our Social Media Policy, which must be observed should you interact with our Fan Pages.

When You interact with our social network accounts, via web or app, we and the providers of the social media technology platforms collect information and personal data relating to You. For this reason, in accordance with Articles 13 and 14 of European Regulation 679/2016 (hereinafter "GDPR"), we have prepared this document to inform You of the personal data we collect, the purposes and methods of processing such data, and the security measures we implement to protect it.

This Social Media Policy constitutes the information notice to data subjects issued pursuant to the applicable personal data protection legislation and applies exclusively to the following Fan Pages:

- Facebook <a href="https://www.facebook.com/MarazziTile/?locale=it\_IT">https://www.facebook.com/MarazziTile/?locale=it\_IT</a>
- Instagram <a href="https://www.instagram.com/marazziceramiche/">https://www.instagram.com/marazziceramiche/</a>
- LinkedIn <a href="https://it.linkedin.com/company/marazzi-group">https://it.linkedin.com/company/marazzi-group</a>
- YouTube <a href="https://www.youtube.com/@gruppomarazzi">https://www.youtube.com/@gruppomarazzi</a>
- Pinterest <a href="https://it.pinterest.com/marazzitile/">https://it.pinterest.com/marazzitile/</a>

(hereinafter, collectively, "Fan Pages").

This Social Media Policy does not apply to third-party fan pages that may be referenced via links or banners within the Fan Pages.

## Source of data and purpose of data processing

## **Browsing data**

The IT systems responsible for the operation of the Services acquire, during their normal functioning, some of Your personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected for the purpose of identifying You, but could lead to Your identification if, for example, combined with data held by third parties. This category of data includes the IP address and the domain name of Your device, the addresses in URI notation (*Uniform Resource Identifier*) of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response provided by the server, and other parameters relating to Your operating system. We use this data solely for the purpose of obtaining anonymous statistical information on the use of the Services and to verify their correct operation. The data may be used to establish liability in the event of computer crimes committed against the Services.





#### Cookies

The list of cookies is available at the following link <a href="https://www.marazzi.it/cookie-policy/">https://www.marazzi.it/cookie-policy/</a>

#### Data relating to Your social network accounts

When You follow our Fan Pages on social networks to obtain information concerning Marazzi and to receive our updates, we become aware of the data that You have shared with the social network. Such data may include Your first and last name, Your e-mail address, the product preferences You have expressed within the social network, as well as the posts and messages You send to our Fan Pages.

Should You collect, process, and communicate information relating to third parties, You must do so in compliance with the provisions of the GDPR and, accordingly, provide them with prior information regarding the processing and, where necessary, obtain their free and explicit consent before carrying out the processing.

For further information regarding the processing of personal data and the terms of use of the Fan Pages:

- Facebook: <a href="https://www.facebook.com/terms.php">https://www.facebook.com/terms.php</a>
- Instagram: https://help.instagram.com/581066165581870
- LinkedIn: <a href="https://www.linkedin.com/legal/user-agreement?\_l=it\_IT">https://www.linkedin.com/legal/user-agreement?\_l=it\_IT</a>
- YouTube: <a href="https://www.youtube.com/static?gl=IT&hl=it&template=terms">https://www.youtube.com/static?gl=IT&hl=it&template=terms</a>
- Pinterest: <a href="https://policy.pinterest.com/it/privacy-policy">https://policy.pinterest.com/it/privacy-policy</a>

# Purpose of processing and nature of provision

The processing is intended to ensure new channels of information, communication, and dialogue with users, through modes of interaction and participation, in order to enhance communication tools and thereby strengthen the relationship with You. We process Your personal data solely for the management of our Fan Pages, to respond to any requests, and to verify that Your messages and/or posts on the page comply with the provisions set forth in this Social Media Policy. The provision of Your personal data is optional; in its absence, You will not be able to view the content of our Fan Pages nor interact with them. At the moment you decide to follow our Fan Pages, thereby enabling you to interact with them and receive our updates directly on your homepage, you provide us with your personal data associated with your social network account. Should you not wish to provide us with your personal data, we invite you to cease or refrain from following our Fan Pages.

### Methods of data processing and data retention

Marazzi processes your personal data through electronic and telematic tools, as well as through instruments provided by the supplier companies of the technological platform of the social media hosting our Fan Pages, in compliance with the security requirements mandated by applicable legislation.

We retain your personal data for as long as you follow our Fan Pages. Even after you have chosen to no longer follow our Fan Pages, we will process your data with reference to your activity and interactions with our Fan Pages prior to that date, in accordance with the policies of the social networks hosting our Fan Pages. We will also retain your data to the extent necessary to comply with obligations imposed by laws or regulations, to protect our rights, to prevent fraud, or to enforce this Social Media Policy.



# Scope of communication

Your personal data processed will be accessible to employees, equivalent personnel and collaborators of Marazzi, who shall act as persons authorised to process personal data.

For technical and organisational purposes, your data may be processed by service providers appointed as Data Processors by the Data Controller in accordance with Article 28 GDPR. The complete and updated list of such entities may be requested by contacting Marazzi at the e-mail address <a href="mailto:privacy@marazzigroup.com">privacy@marazzigroup.com</a>.

We also inform you that the processing of data will be carried out via a social technological platform; therefore, you also disclose your data to the owners of the systems and platforms, who are joint controllers of the processing.

# Transfer of data abroad

Your personal data will not be transferred by Marazzi outside the European Union or to countries that do not guarantee an adequate level of data protection.

With regard to the data processed by the supplier companies of the social media technological platform, you are invited to take note of the following:

- Facebook: <a href="https://www.facebook.com/terms.php">https://www.facebook.com/terms.php</a>
- Instagram: <a href="https://help.instagram.com/581066165581870">https://help.instagram.com/581066165581870</a>
- LinkedIn: https://www.linkedin.com/legal/user-agreement?\_l=it\_IT
- YouTube: <a href="https://www.youtube.com/static?gl=IT&hl=it&template=terms">https://www.youtube.com/static?gl=IT&hl=it&template=terms</a>
- Pinterest: https://policy.pinterest.com/it/privacy-policy

# Rights of the data subject

Marazzi requires that the joint controller companies be established within the EU and accepts that they may make and implement decisions concerning the processing of Statistical Data. Any disputes shall be subject to jurisdiction in Italy. Should Marazzi be contacted by data subjects or the Supervisory Authority regarding the processing conducted on the social media pages, it must promptly notify the joint controller companies.

The data subject may at any time request from Marazzi access to personal data, rectification, erasure, or restriction of the processing of personal data, or object to their processing, in addition to the right to data portability. You may exercise your rights pursuant to Articles 15 to 22 of the GDPR by writing to the following contacts: privacy@marazzigroup.com, dpo@marazzigroup.com Tel. +39 0536 860800

Withdrawal of consent: the data subject may at any time withdraw consent to the processing of their data without prejudice to the lawfulness of processing based on consent prior to its withdrawal. Withdrawal of consent in relation to data necessary for the provision of Services entails the termination of such Services. The data subject may submit a complaint to the Supervisory Authority.





## Joint Controllers and Data Protection Officers

The Joint Controllers of the processing of personal data are as follows:

Marazzi: Marazzi Group S.r.l., sole shareholder company with registered office at Viale Regina Pacis 39 – 41049 Sassuolo (MO), Italy, represented by its legal representative pro tempore privacy@marazzimarazzigroup.com tel. +39 0536 860800

#### Supplier companies of the technological platform of the social media.

- For Facebook and Instagram, Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.
- For LinkedIn, LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland.
- For YouTube, Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland
- For Pinterest, the company Pinterest Europe Ltd., Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Ireland

#### Administrator of Marazzi's social media pages:

Marazzi Group S.r.l., sole shareholder company, with registered office at Via Regina Pacis 39 – 41049 Sassuolo (Mo), Italy <u>privacy@marazzigroup.com</u> tel. +39 0536 860800

The Data Protection Officers pursuant to Article 37 of the GDPR are:

For Marazzi: dpo@marazzigroup.com

For the supplier companies of the social media technological platform, the references are indicated on their respective institutional websites

- Facebook and Instagram
   https://www.facebook.com/help/contact/540977946302970.
- b) LinkedIn <a href="https://www.linkedin.com/help/linkedin/ask/TSO-DPO">https://www.linkedin.com/help/linkedin/ask/TSO-DPO</a>
- c) YouTube <a href="https://support.google.com/cloud/contact/dpo">https://support.google.com/cloud/contact/dpo</a>
- d) Pinterest <a href="https://help.pinterest.com/it/data-protection-officer-contact-form">https://help.pinterest.com/it/data-protection-officer-contact-form</a>

# **SOCIAL MEDIA POLICY**

The Social Media Policy is the formally adopted code of conduct governing the relationship on the internet, and in particular on social media, between Marazzi and its users (External Social Media Policy).

Marazzi's social channels are managed by the Marketing Department and duly authorised communication agencies.

Marazzi reserves the right to create Pages or Groups dedicated to the promotion of specific projects, identifiable by the page title and managed by specifically authorised persons. Users' comments and posts, who are invited to always identify themselves with their full name, represent the opinions of the individuals and not those of Marazzi, which cannot be held responsible for content posted on its channels by third parties.

#### Moderation

Marazzi's social media channels are ordinarily moderated during office hours (Monday to Friday from 09:00 to 18:00).

A polite, relevant and respectful conversation is encouraged: on Marazzi's social media channels, all may participate to express their free opinion, always observing the rules of courtesy and respect for others.

Comments and posts that contravene the conditions set forth in this document shall be moderated, including preventively, and promptly removed.



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Insults, profanity, threats or conduct that undermines the dignity of individuals and the decorum of Institutions, the rights of minorities and minors, the principles of freedom and equality, and in particular, shall not be tolerated:

- content that promotes, favours, or perpetuates discrimination on the grounds of sex, race, language, religion, political opinions, belief, age, marital status, status in relation to public assistance, nationality, physical or mental disability, or sexual orientation:
- · sexual content or links to sexual content;
- solicitations for commercial purposes;
- · conducting or encouraging unlawful activities;
- information that may compromise public security;
- content that infringes upon the interests of legal property rights or third parties;
- comments or posts containing special categories of personal data (so-called sensitive data) in breach of the Data Protection Act.

Comments and content of the following types are also discouraged and, in any event, subject to moderation:

- comments not relevant to the specific published topic (off topic);
- comments in favour of or against political campaigns or voting recommendations;
- · offensive language or content;
- comments and posts intended to disrupt the discussion or to offend those who
  manage and moderate the social media channels;
- spam;
- repeated postings;

Marazzi reserves the right to remove any content deemed to be in breach of this social media policy or any applicable law. In the event of a breach of these conditions or those contained in the policies of the adopted platforms, the right is reserved to impose bans or blocks to prevent further contributions and, where appropriate, to report the user to the competent law enforcement authorities.

#### **Privacy**

Please be reminded that the processing of users' personal data complies with the policies applicable to the platforms used (Facebook, Instagram, LinkedIn, YouTube, Pinterest, etc.). It should be noted that data belonging to special categories (Article 9 of the GDPR) posted in comments or public posts within Marazzi's social media channels will be removed (see the Moderation section). Data shared by users through private messages sent directly to Marazzi's channels will be processed in accordance with current legislation on the processing of personal data.

To contact the editorial office of Marazzi's social media channels, please send a message directly via the platform.

The policies for each social media platform used by Marazzi are set out below, to clarify the types of content conveyed, the content creators, and how online conversations are managed.

# **Facebook Policy**

Marazzi maintains an institutional profile on Facebook <a href="https://www.facebook.com/MarazziTile/?locale=it\_IT">https://www.facebook.com/MarazziTile/?locale=it\_IT</a>

Following Marazzi does not automatically result in being followed in return. An analysis is conducted of users who "like" the page and those who "register", with the objective of better identifying the recipients of communications and adopting appropriate communication methods and content.

Users may post texts, photographs or videos on their own Facebook profiles mentioning



Marazzi. Users are free to share Marazzi's posts on their own profiles. Marazzi's Facebook page can be contacted via private messages. Comments, proposals and ideas from visitors are welcomed. A direct response is not guaranteed; however, where the relevance of the topic and the appropriateness of the communicative style are recognised, Marazzi's editorial office participates in the conversation and responds to comments.

#### **Instagram Policy**

Marazzi maintains an institutional profile on Instagram.

https://www.instagram.com/marazziceramiche/

Following Marazzi does not automatically result in being followed in return. An analysis is conducted of users who 'like' the photos, with the aim of better identifying the recipients of the messages and adopting appropriate communication methods and content.

Users may post texts, photos or videos on their own Instagram profiles mentioning Marazzi. Users are free to share Marazzi's photos on their own profiles.

Comments, proposals and ideas from visitors are welcomed. A direct response is not guaranteed; however, where the relevance of the topic and the appropriateness of the communicative style are recognised, Marazzi's Marketing Department participates in the conversation and replies to comments.

#### LinkedIn Policy

LinkedIn is a social network designed for the professional sphere. It constitutes an excellent tool for highly specialised or qualified professionals seeking to expand their network of contacts or to be discovered by potential recruiters. LinkedIn also represents a significant communication channel for companies, enabling them to achieve considerable visibility and to reach numerous users interested in a specific sector.

Marazzi maintains an institutional profile on

LinkedIn(https://it.linkedin.com/company/marazzi-group)

The objectives of the page are multiple, including being discovered by industry experts and potential clients, linking the page to employees' professional profiles, and showcasing its products and services.

Following Marazzi does not automatically result in being followed in return. Nonetheless, periodic surveys are conducted on users with the purpose of identifying message recipients and adopting suitable communication methods and content.

Users may post texts, photos or videos on their LinkedIn profiles citing Marazzi. Users are free to share Marazzi's posts on their own profiles.

Comments, proposals and ideas from visitors are welcomed. A direct response is not guaranteed; however, where the relevance of the topic and the appropriateness of the communicative style are recognised, Marazzi's editorial office participates in the conversation and responds to comments.

#### YouTube Policy

Marazzi's YouTube account(https://www.youtube.com/@gruppomarazzi)is managed by the Marketing Department and the designated digital team.

No automation tools (such as those generating posts from RSS feeds) are used to post videos; videos are uploaded and published exclusively by authorised personnel.

The videos on the channel may be:

- produced directly by the designated team;
- produced by third parties on behalf of Marazzi;
- produced by third parties for journalistic purposes concerning corporate matters.

Subscribers to the channel are not automatically followed. An analysis of subscribers is carried out with the objective of better identifying the recipients of the videos and adopting appropriate communication methods and content.

By default, Marazzi opts to disable the addition of comments to videos by visitors and to remove comments deemed unsuitable for the channel.





#### **Pinterest Policy**

Marazzi maintains an institutional profile on Pinterest(<a href="https://it.pinterest.com/marazzitile/">https://it.pinterest.com/marazzitile/</a>)
Pinterest is a social platform based on the sharing ofphotographs, videos, and images. Pinterest enables users to create boards in which to catalogue images found onweb pagesaccording to predefined or user-selected themes. On Pinterest, the user utilises the "Save" button that appears on multimedia content(such as images and videos) on a web page. The button allows the visitor to "pin" (attach or fasten with a pin) this content, organising it into categories of interest (the so-called boards).

The purposes of the page are manifold, for example, to be found by Pinterest users, to present one's products and services, to interact with visitors, and to monitor statistics on the content, among others.

Visitors may also submit comments to Marazzi. While a direct response is not guaranteed, where the relevance of the topic and the appropriateness of the communicative style are established, Marazzi's personnel engage in the conversation and respond to the comments.

Extract from EU Regulation 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 – Rights of the Data Subject 1. The data subject has the right to obtain confirmation as to whether or not personal data concerning them exist, even if not yet recorded, and

their communication in an intelligible form, as well as the possibility to lodge a complaint with the Supervisory Authority.

- 2. The data subject has the right to obtain information regarding:
  - a) the origin of the personal data:
  - b) the purposes and methods of the processing;
  - c) the logic applied in the event of processing carried out with the aid of electronic tools;
  - d) the identifying details of the controller, processors, and the representative designated pursuant to Article 5, paragraph 2;
  - e) of the data subjects or categories of data subjects to whom personal data may be disclosed or who may become aware thereof in their capacity as designated representatives within the territory of the State, as data controllers or personnel authorised to process personal data.
- 3. The data subject has the right to obtain:
  - a) the updating, rectification or, where applicable, the completion of the data;
  - the erasure, anonymisation or blocking of data processed unlawfully, including data which do not require retention in relation to the purposes for which they were collected or subsequently processed;
  - c) certification that the operations referred to in points a) and b) have been communicated, including as to their content, to those to whom the data have been disclosed or disseminated, except where such compliance is impossible or involves the use of means manifestly disproportionate to the right protected;
  - d) the portability of data.
- 4. The data subject has the right to object, in whole or in part:
  - a) for legitimate reasons, to the processing of personal data concerning them, even if pertinent to the purpose of the collection;
  - b) to the processing of personal data concerning them for the purposes of sending advertising material, direct sales, or for conducting market research or commercial communications.

Sassuolo, 10/07/2025

