

Modena, 31.07.2025

SOCIAL MEDIA POLICY

Information on the use of our Fan Pages and information on the processing of personal data pursuant to Article 13 and 14 of EU Regulation 2016/679 on the protection and processing of personal data (GDPR) for company social pages

Premise

In thanking you for joining our communities, **HARS S.r.l. società unipersonale** (hereinafter "**HARS**") we draw your attention to the risks you may incur by entering personal data, photos, videos, images and/or comments on the Fan Pages.

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

When you interact with our social network accounts, via the web or in apps, we and the providers of social media technology platforms collect information and personal data about you. For this reason, in accordance with the provisions of art. 13 and 14 of European Regulation 679/2016 (hereinafter "**GDPR**"), we have created this document for the purpose of describing to you what personal data we collect, the purposes and methods of processing them and the security measures we take to protect them.

This Social Media Policy constitutes the information to data subjects issued in accordance with the applicable legislation on the protection of personal data and applies exclusively to the following Fan Pages:

- Facebook <https://www.facebook.com/CAST.SysDatGroup/>
- LinkedIn: <https://it.linkedin.com/company/cast-sysdatgroup>
- YouTube <https://www.youtube.com/@CASTSYS-DATGroup>

(hereinafter, collectively, "**Fan Pages**").

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

HARS S.r.l. – Società unipersonale

Viale Virgilio, 54 G - 41123 Modena (Italia)

Tel. +39 059 885 711

info.cast@sys-datgroup.com • <https://www.sys-datgroup.com/cast/>

PEC: hars@pec.it

Capitale Sociale: € 115.000 i.v.

P. IVA: 01846470365 • REA: MO-247221

Source of data and purpose of data processing

Browsing data

The computer systems used to operate the Services acquire, during their normal operation, 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, it is combined with data held by third parties. This category of data includes the IP address and domain name of your device, the URI (*Uniform Resource Identifier*) addresses of the resources requested, 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 given by the server and other parameters relating to your operating system. We use this data for the sole purpose of obtaining anonymous statistical information on the use of the Services and to check their correct functioning. The data could be used to ascertain responsibility in the event of computer crimes committed against the Services.

Cookies

The list of cookies is available at the following link <https://www.sys-datgroup.com/cookie-policy/>

Data relating to your social network accounts

When you follow our Fan Pages within social networks to find information about HARS and to receive our updates, we become aware of the data you have shared with the social network. This data may include your first and last name, your email address, the product preferences you have expressed within the social network as well as the posts and messages you send to our Fan Pages.

If you collect, process and communicate information relating to third parties, you must do so in accordance with the provisions of the GDPR and, therefore, you must provide them with prior information on the processing and, if necessary, you must obtain their free and express consent before carrying out the processing.

For more information on the processing of personal data and the terms of use of the Fan Pages:

- Facebook <https://www.facebook.com/CAST.SysDatGroup/>
- LinkedIn: <https://it.linkedin.com/company/cast-sysdatgroup>
- YouTube: <https://www.youtube.com/@CASTSYS-DATGroup>

Purpose of the processing and nature of the provision

The processing is aimed at ensuring new channels of information, communication and dialogue with users, with methods of interaction and participation, in order to allow the strengthening of the means of communication in order to strengthen a relationship with you. We process your personal data only for the management of our Fan Pages, to respond to any requests and to check that your messages and/or posts on the page are in line with the indications set out in this Social Media Policy. The provision of your personal data is optional and without it you will not be able to view the content of our Fan Pages or interact with them. When you decide to follow our Fan Pages, and can therefore interact with them and receive our updates directly on your homepage, you provide us with your personal data associated with your account on the social network. If you do not wish to provide us with your personal data, we invite you to stop or refrain from following our Fan Pages.

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Methods of data processing and data storage

HARS processes your personal data through electronic and telematic tools and through the tools provided by the companies supplying the social media technology platform that host our Fan Pages, in compliance with the security requirements required by applicable legislation.

We keep your personal data for as long as you follow our Fan Pages. Even after you have chosen to stop following our Fan Pages, we will process your data with reference to your activity and your interactions with our Fan Pages that took place before that date, in accordance with the policies of the social networks that host 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 known by HARS's employees, similar personnel and collaborators, who will operate as subjects authorised to process personal data.

For technical and organisational reasons, your data may be processed by service providers appointed as Data Processors by the Data Controller in compliance with Article 28 of the GDPR. The complete updated list of these subjects can be requested by contacting HARS at the e-mail address privacy.cast@sys-datgroup.com

We also inform you that the data processing will take place through a social technological platform, therefore you also communicate your data to the owners of the systems and platforms, joint data controllers.

Transfer of data abroad

Your personal data will not be transferred by HARS 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 companies providing the social media technological platform, we invite you to read the following:

Facebook: <https://www.facebook.com/terms.php>

Linkedin: https://www.linkedin.com/legal/user-agreement?l=it_IT

Youtube <https://www.youtube.com/static?gl=IT&hl=it&template=terms>

Rights of the data subject.

HARS prescribes that the joint controllers must be based within the EU and accepts that they may make and implement decisions on the processing of Statistical Data. Any disputes will be handled with jurisdiction in Italy.

In the event that HARS is contacted by the data subjects or by the Data Protection Authority regarding the processing carried out on the social pages, it must promptly notify the joint controllers.

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The data subject may at any time ask HARS for access to personal data, rectification, erasure or limitation of the processing of personal data or to object to their processing, as well as the right to data portability. You may exercise your rights under Articles 15 to 22 of the GDPR by writing to the following addresses: privacy.cast@sys-datgroup.com, dpo.cast@sys-datgroup.com Tel. +39 059 885711

Withdrawal of consent: The data subject may at any time withdraw consent to the processing of his or her data without affecting the lawfulness of the processing based on consent before the withdrawal. Withdrawal of consent with regard to the data necessary for the provision of services will result in the interruption of the same. The data subject may lodge a complaint with the Supervisory Authority.

Joint controllers and data protection officers

The Joint Controllers of the processing of personal data are:

Marazzi: HARS Group S.r.l. sole shareholder with registered office in Viale Virgilio 54/g 41123 Modena (Mo) Italy, in the person of its legal representative privacy.cast@sys-datgroup.com tel. +39 59 885711

Companies that provide the social media technology platform.

- For Facebook, the company Meta Platforms Ireland Limited, 4 Grand Canal Square, Ghent Canal Harbour, Dublin 2, Ireland.
- For LinkedIn, the company LinkedIn Ireland Unlimited Company Wilton Plaza Wilton Place, Dublin 2 Ireland
- For Youtube, the company Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

Administrator of Marazzi's social pages:

HARS S.r.l. sole shareholder with registered office in Viale Virgilio 54/g – 41123 Modena (MO) Italy privacy.cast@sys-datgroup.com tel. +39 059 885711

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

For HARS: dpo.cast@sys-datgroup.com

For the companies supplying the social media technology platform, the references are indicated on their respective institutional websites

- a) Facebook <https://www.facebook.com/help/contact/540977946302970>.
- b) LinkedIn <https://www.linkedin.com/help/linkedin/ask/TSO-DPO>
- c) Youtube <https://support.google.com/cloud/contact/dpo>

SOCIAL MEDIA POLICY

The Social Media Policy is the formally adopted code of conduct that regulates the relationship on the internet, and in particular on social media, between HARS and its users (External Social Media Policy). Marazzi's social media channels are managed by the Marketing Office and duly appointed communication agencies.

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HARS reserves the right to create Pages or Groups dedicated to the promotion of specific projects, identifiable by the title of the page itself by specifically authorised persons. The comments and posts of users, who are always invited to introduce themselves with their name and surname, represent the opinion of individuals and not that of Marazzi, which cannot be held responsible for what is posted on its channels by third parties.

Moderation

Marazzi's social media channels are normally moderated during office hours (Monday/Friday from 09.00 to 18.00). A polite, relevant and respectful conversation is invited: on Marazzi's social media channels, everyone can intervene to express their free opinion, always following the good rules of politeness and respect for others. Comments and posts that violate the conditions set out in this document will be moderated, even preventively, and will be promptly removed. Insults, foul language, threats or attitudes that harm the dignity of persons and the decorum of institutions, the rights of minorities and minors, the principles of freedom and equality and in particular: – content that promotes, favors, or perpetuates discrimination on the basis of sex, race, language, religion, political opinions, beliefs, age, marital status, status in relation to public assistance, nationality, physical or mental disability or sexual orientation;– sexual content or links to sexual content;– solicitation of commerce;– conduct or encouragement of illegal activities;– information that may tend to compromise public safety;– content that violates the interest of legal property or third parties;– comments or posts that present special categories of personal data (so-called personal data) sensitive) in violation of the Privacy Law.

Comments and content of the following genres are also discouraged and in any case subject to moderation:– comments that are not relevant to that particular topic published (off topic);– remarks for or against political campaigns or voting indications;– offensive language or content;– comments and posts written to disturb the discussion or offend those who manage and moderate social channels;– spam;– repeated posts;

HARS reserves the right to remove any content that is deemed to be in violation of this social media policy or any applicable law. For those who violate these conditions or those contained in the policies of the tools adopted, we reserve the right to use the ban or block to prevent further interventions and possibly to report the user to the appropriate law enforcement agencies.

Privacy

Please note that the processing of users' personal data complies with the policies in use on the platforms used (Facebook, LinkedIn, YouTube, , etc.). Please note that data belonging to special categories of data (Art. 9 of the GDPR) posted in comments or public posts within HARS's social channels will be removed (see Moderation section). The data shared by users through private messages sent directly to HARS's channels will be processed in compliance with current legislation on the processing of personal data. To contact the editorial staff of Marazzi's social channels, send a message directly to the platform.

Below are the policies for each social media used by HARS, to clarify what type of content is conveyed, who produces it and how the online conversation is managed.

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Facebook Policy

HARS has an institutional profile on Facebook <https://www.facebook.com/CAST.SysDatGroup/>

Those who follow HARS are not automatically followed.

The analysis of users who "like" the page and users who "register" is carried out, with the aim of better identifying the recipients of the messages and adopting appropriate communication methods and content.

Users can post texts, photos or videos on their Facebook profile mentioning Marazzi.

Users are free to share their Facebook posts on their profiles Marazzi.

HARS Facebook page can be reached via private messages.

Comments, proposals and ideas from visitors are appreciated. A direct response is not guaranteed but, where the usefulness of the topic and the adequacy of the communication style are recognised, the HARS editorial staff participates in the conversation and responds to comments.

LinkedIn Policy

LinkedIn is a social network designed for the world of work. It is an excellent tool for very specific or highly qualified professionals, who want to extend their network of contacts or be found by potential recruiters. LinkedIn is also a relevant means of communication for companies, which can gain great visibility and reach many users interested in a specific sector.

HARS has an institutional profile on LinkedIn (<https://it.linkedin.com/company/cast-sysdatgroup>)

The purposes of the page are many, for example to be found by experts in the field and potential customers, to link the page to the professional profiles of employees, to present its products and services.

Those who follow HARS are not automatically followed.

However, user surveys are periodically carried out with the aim of identifying the recipients of the messages and adopting appropriate communication methods and content.

Users can post texts, photos or videos on their LinkedIn profile mentioning Marazzi.

Users are free to share Marazzi's posts on their profiles.

Comments, proposals and ideas from visitors are appreciated. A direct response is not guaranteed but, where the usefulness of the topic and the adequacy of the communication style are recognised, the HARS editorial staff participates in the conversation and responds to comments.

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YouTube Policy

Marazzi's YouTube account (<https://www.youtube.com/@CASTSYS-DATGroup>) is managed by Marketing and the digital team in charge.

No automatism are used to post videos (such as tools that generate posts from RSS feeds): videos are uploaded and published exclusively by the people in charge.

The videos on the channel can be:

- made directly by the team in charge
- made by third parties on behalf of HARS
- made by third parties for the purpose of journalistic information on corporate issues.

Those who subscribe to the channel are not automatically followed. Subscriber analysis is carried out, with the aim of better identifying the recipients of the videos and adopting appropriate communication methods and content.

By default, HARS chooses to disable the addition of comments to videos by visitors and to remove comments if deemed unsuitable for the channel.

Extract from EU Reg.to 2016/679: Art. 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the Data Subject

1. The data subject has the right to obtain confirmation of the existence or otherwise of personal data concerning him/her, even if not yet recorded, and the communication in intelligible form and the possibility of making a complaint to the Supervisory Authority.

2. The data subject shall have the right to obtain information:

- a) the origin of the personal data;
- b) the purposes and methods of processing;
- c) the logic applied in the case of processing carried out with the aid of electronic tools;
- d) the identification details of the data controller, the data processors and the representative designated pursuant to Article 5, paragraph 2;
- e) of the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of them in their capacity as designated representatives in the territory of the State, managers or personnel authorized to process personal data.

3. The data subject has the right to obtain:

- a) updating, rectification or, when interested, integration of data;
- b) the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those whose retention is not necessary in relation to the purposes for which the data were collected or subsequently processed;
- c) certification that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except in the case in which this fulfilment proves impossible or involves the use of means manifestly disproportionate to the protected right;
- d) data portability.

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4. The data subject shall have the right to object, in whole or in part:
- a) for legitimate reasons to the processing of personal data concerning him/her, even if pertinent to the purpose of the collection;
 - b) to the processing of personal data concerning him/her for the purpose of sending advertising material or direct sales or for carrying out market research or commercial communication

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