

IM MILANO - FIRENZE

INFORMATIVA PRIVACY– Aggiornamento del 22/07/2025
Informativa art. 13 Regolamento UE 679/16 (GDPR)

1) Perché ricevi questa comunicazione

Istituto Marangoni S.r.l. in qualità di Titolare del Trattamento, vuole informarti su quali dati raccoglie e con quali modalità, in modo da garantire il rispetto dei tuoi diritti e delle tue libertà fondamentali, con particolare riferimento alla riservatezza e alla sicurezza con cui i dati vengono trattati.

2) Quali dati personali raccogliamo

Istituto Marangoni S.r.l. raccoglie e conserva i tuoi dati:

- anagrafici e identificativi (quali ad esempio nome, cognome, indirizzo di residenza, indirizzo e-mail, corsi di interesse, cittadinanza, sesso, luogo e data di nascita, numero di telefono, copia del documento d'identità);
- bancari propri e/o di chi effettua il pagamento;
- carriera scolastica/curriculum vitae.

Possiamo chiedere ai canali social di inviare informazioni sui nostri corsi in base ai profili dei loro utenti e secondo quanto previsto dalla loro informativa sul trattamento dei dati, ma non siamo a conoscenza del tuo nominativo.

3) Per quali finalità usiamo i tuoi dati personali

Istituto Marangoni S.r.l. utilizza i tuoi dati per le seguenti finalità:

- a) Consentire di immatricolarti al corso di tua scelta, nonché per l'erogazione di servizi correlati.
- b) Accreditarti per eventi legati al tuo piano di formazione
- c) Rispondere alle tue richieste di informazioni.

In relazione alle finalità di cui ai punti 3 (a), (b) e (c) il trattamento è necessario all'esecuzione di misure precontrattuali (Art. 6, par. 1, Lett. b) del GDPR).

- d) Esercitare i diritti del Titolare del Trattamento

In relazione alla finalità di cui al punto d), il trattamento è necessario per il perseguimento del legittimo interesse (Art. 6 par. 1, Lett. f) del GDPR).

- e) Inviarti informazioni su Campus, scholarship, corsi ed eventi che potrebbero interessarti.
- f) Inviarti informazioni ed aggiornamenti su Istituto Marangoni e sulla tua iscrizione tramite Whatsapp
- g) Per finalità di profilazione

In relazione alle finalità di cui al punto e), f) e g) la base giuridica del trattamento è il tuo consenso (Art. 6, par. 1, Lett. a) del GDPR).

4) Per quanto tempo conserviamo i tuoi dati personali

Per le finalità di cui al punto 3 (a), (b), conserviamo i tuoi dati personali per tutta la durata dell'istaurando rapporto contrattuale ed anche oltre il termine decennale di prescrizione dalla cessazione del rapporto per adempiere ad obblighi di legge nonché per finalità di tutela giurisdizionale.

Per la finalità di cui al punto (c) e (d) conserviamo i tuoi dati per un periodo di tempo non eccedente 12 mesi dalla raccolta.

Per le finalità di cui ai punti (e), (f) e (g) conserviamo i tuoi dati fino a 3 anni, fermo restando la tua facoltà di revocare il consenso in qualsiasi momento.

Una volta decorso il termine di conservazione, i dati saranno distrutti o resi anonimi.

N.B. Qualora, in caso di contenzioso, sia necessario accertare, esercitare o difendere i diritti del Titolare, il periodo di conservazione dei dati raccolti, per le finalità di cui sopra, potrà essere prolungato in ragione della possibilità che sia necessario predisporre elementi difensivi in tale arco temporale. In tal caso, la conservazione dei dati avverrà esclusivamente fino alla conclusione del contenzioso.

5) La sicurezza dei tuoi dati personali

Il trattamento dei tuoi dati avverrà mediante strumenti idonei a garantirne la riservatezza, l'integrità e la disponibilità. Il trattamento può essere effettuato in modalità cartacea o mediante sistemi informativi e/o automatizzati e comprenderà tutte le operazioni o complesso di operazioni previste dall'art.4 del GDPR e necessarie al trattamento in questione, ivi inclusa la comunicazione nei confronti dei soggetti incaricati al trattamento stesso. I dati in questione non saranno soggetto di diffusione; invece, saranno o potranno essere comunicati a soggetti, pubblici o privati, che operano nell'ambito delle finalità sopra descritte.

6) Chi può accedere ai tuoi dati personali

Possono accedere ai tuoi dati esclusivamente persone autorizzate nell'ambito delle mansioni assegnate da Istituto Marangoni S.r.l., anche in sedi collocate al di fuori dell'Unione Europea.

Istituto Marangoni S.r.l. fa parte di Galileo Global Education Italia. Potrebbero altresì avere accesso ad alcuni dei tuoi dati gli incaricati dipendenti di Galileo Global Education Italia, nonché dipendenti di NABA (Nuova Accademia S.r.l.) e Domus Academy, appartenenti allo stesso Gruppo Galileo Global Education Italia.

Potranno avere accesso ad alcuni tuoi dati anche enti pubblici non economici (es. MIUR, Regione Lombardia) quando la comunicazione sia necessaria per lo svolgimento delle funzioni istituzionali dell'ente richiedente.

I dati personali non saranno in alcun modo diffusi, potranno essere inoltre comunicati e trattati da soggetti terzi debitamente nominati quali Responsabili del Trattamento, come ad esempio collaboratori esterni e società che forniscono specifici servizi strumentali.

I dati personali potranno inoltre essere accessibili o potranno essere comunicati a soggetti cui la facoltà di accedere ai tuoi dati personali sia riconosciuta da disposizioni di legge o di normativa secondaria o comunitaria.

7) Dove risiedono i tuoi dati personali

I tuoi dati personali saranno gestiti e conservati su server ubicati all'interno dello Spazio Economico Europeo (SEE) e appartenenti al Titolare del trattamento e/o a società terze nominate e debitamente identificate come Responsabili del trattamento.

I tuoi dati potranno altresì essere trattati dalle altre società appartenenti al gruppo di Istituto Marangoni, situate all'esterno dello Spazio Economico Europeo (SEE), adottando idonee misure di sicurezza al fine di garantire un livello di protezione adeguato.

Inoltre, alcune società terze nominate Responsabili del trattamento potrebbero trasferire i tuoi dati personali su server situati all'esterno dello Spazio Economico Europeo (SEE) In tal caso ciò avverrà in conformità agli articoli 44 e seguenti del GDPR, utilizzando garanzie adeguate ad assicurarne la protezione. Ulteriori informazioni su tali garanzie possono essere richieste al Titolare del trattamento.

8) È obbligatorio acconsentire al conferimento dei tuoi dati?

Il conferimento dei tuoi dati di cui al punto 3 (a), (b), (c) e (d) necessario per stipulare e dare esecuzione al contratto. Per le finalità di cui al punto 3 (e), (f), (g) è facoltativa, se non acconsenti non potrai venire a conoscenza delle nostre iniziative, dei nostri eventi, dei corsi che attiveremo.

9) Quali sono i tuoi diritti in relazione al GDPR?

Secondo le disposizioni del GDPR, Istituto Marangoni S.r.l. garantisce i seguenti diritti:

- Diritto di revoca del consenso [art. 7, par. 3, del Regolamento UE] (diritto di revocare il consenso prestato. Nota: la revoca del consenso non pregiudica la liceità del trattamento basata sul consenso prima della revoca);
- Diritto di accesso dell'interessato [art. 15 del Regolamento UE] (diritto di ottenere la conferma dell'esistenza o meno dei dati personali a lui relativi e la loro copia in forma intelligibile);
- Diritto di rettifica [art. 16 del Regolamento UE] (diritto alla rettifica dei dati personali inesatti che lo riguardano);
- Diritto alla cancellazione ("diritto all'oblio") [art. 17 del Regolamento UE] (diritto alla cancellazione dei propri dati. Nota: qualora i dati siano già stati diffusi, cioè messi a disposizione di un numero indeterminato di destinatari - ad esempio tramite pubblicazione sul sito di Istituto Marangoni S.r.l.-, potrebbe risultare impossibile per Istituto Marangoni S.r.l. cancellarli / distruggerli; pertanto, qualora dovesse essere risultare impossibile procedere con la

cancellazione dei dati in virtù di quanto appena indicato, Istituto Marangoni S.r.l. La informerà delle ragioni per le quali risulta impossibile procedere in tal senso nel caso di specie e perseguirà il diritto all'oblio);

- Diritto di limitazione di trattamento [art. 18 del Regolamento UE] (diritto di ottenere la limitazione del trattamento, ad esempio, in caso di contestazione dell'esattezza dei dati o in caso di trattamenti illeciti);
- Diritto alla portabilità dei dati [art. 20 del Regolamento UE] (diritto di ricevere in un formato strutturato, di uso comune e leggibile da dispositivo automatico i dati personali che lo riguardano forniti a Istituto Marangoni S.r.l. e diritto di trasmettere tali dati a un altro Titolare del trattamento senza impedimenti da parte di Istituto Marangoni S.r.l. qualora il trattamento sia eseguito sulla base di un consenso e sia effettuato con mezzi automatizzati);
- Diritto di opposizione [art. 21 del Regolamento UE] (diritto di opposizione al trattamento dei propri dati personali);
- Diritto di non essere sottoposto a processi decisionali automatizzati [art. 22 del Regolamento UE] (diritto a non essere sottoposto ad una decisione basata unicamente sul trattamento automatizzato).

I suddetti diritti possono essere esercitati in forma scritta, inviando una e-mail a dpo@istitutomarangoni.com. Al medesimo contatto potranno essere richieste in ogni momento maggiori informazioni in merito al trattamento dei dati personali. Si precisa anche che l'esercizio dei propri diritti non deve pregiudicare e/o ledere i diritti e le libertà altrui.

Istituto Marangoni S.r.l. si impegna a rispondere alle richieste entro il termine di un mese, salvo il caso di richieste di particolare complessità, per le quali potrebbe essere impiegato un massimo di 3 mesi. In ogni caso, Istituto Marangoni S.r.l. provvederà a spiegare il motivo dell'attesa entro un mese dalla richiesta.

L'esito della richiesta verrà fornito per iscritto (a richiesta dell'interessato) o su formato elettronico (e, in questo caso, gratuitamente). Istituto Marangoni S.r.l. specifica che potrà essere richiesto all'interessato un eventuale contributo qualora le sue domande risultino manifestamente infondate, eccessive o ripetitive: a tal proposito Istituto Marangoni S.r.l. terrà traccia delle richieste.

Istituto Marangoni S.r.l., in ossequio all'art. 19 del Regolamento UE, si impegna a riferire ai destinatari cui sono stati comunicati i dati personali dell'interessato le eventuali rettifiche, cancellazioni o limitazioni del trattamento richieste dall'interessato, ove ciò sia possibile.

10) Diritto di proporre reclamo (art. 77 del Regolamento UE)

L'interessato, qualora ritenga che i propri diritti siano stati compromessi o lesi, o che il trattamento dei propri dati sia contrario alla normativa in vigore, ha diritto di proporre reclamo all'Autorità Garante per la protezione dei dati personali secondo le modalità indicate dalla stessa Autorità al seguente indirizzo Internet:

<https://www.garanteprivacy.it/home/docweb/-/docweb-display/docweb/4535524>.

11) Titolare del Trattamento

Il Titolare del Trattamento è: Istituto Marangoni S.r.l. – Via Pietro Verri, 4 20121 Milano MI

Mail: privacy@istitutomarangoni.com

Il Responsabile per la Protezione dei Dati è contattabile al seguente indirizzo e-mail: dpo@istitutomarangoni.com

12) Aggiornamento della presente informativa

La presente informativa può subire variazione. Eventuali modifiche sostanziali ti saranno comunicate via mail o attraverso il nostro sito internet.

IM MILANO - FIRENZE

PRIVACY POLICY – Updated on 22/07/2025

Information pursuant to art. 13 of EU Regulation 679/16 (GDPR)

1) Why you are receiving this communication

Istituto Marangoni S.r.l. as the Data Controller, wants to inform you about what data it collects and how, so as to ensure that your fundamental rights and freedoms are respected, with particular reference to the confidentiality and security with which the data are processed.

2) What personal data we collect

Istituto Marangoni S.r.l. collects and stores your data:

- personal and identifying information (such as name, surname, residential address, e-mail address, courses of interest, citizenship, gender, place and date of birth, telephone number, copy of identity document);
- own bank account and/or the bank account of the person making the payment;
- educational background/curriculum vitae;

We may ask social channels to send information about our courses based on the profiles of their users and in accordance with their data processing policy, but we are not aware of your name.

3) For which purposes we use your personal data

Istituto Marangoni S.r.l. uses your data for the following purposes:

- a) To enable you to enroll in the course of your choice, as well as for the provision of related services.
- b) Accrediting you for events related to your training plan.
- c) Respond to your requests for information

In relation to the purposes under 3 (a), (b) and (c) the processing is necessary for the performance of a contract to which you are a party (Art. 6(1)(b) GDPR).

- d) Exercising the rights of the Data Controller.

In relation to the purpose under d), processing is necessary for the pursuit of legitimate interest (Art. 6 par. 1, Lett. f) of the GDPR).

- e) Send you information on Campus initiatives, scholarships, courses and events that may be of interest to you.
- f) Send you information and updates on Istituto Marangoni and your membership through Whatsapp.
- g) For profiling purposes.

In relation to the purposes in (e), (f) (g) the legal basis for processing is your consent (Art. 6(1)(a) GDPR).

4) How long we keep your personal data.

For the purposes under 3 (a) and (b) we keep your personal data for the duration of the contractual relationship being established and also beyond the ten-year limitation period from the termination of the relationship in order to fulfil legal obligations as well as for the purposes of legal protection.

For the purposes referred to in point (c) and (d) we keep your data for a period not exceeding 12 months from collection.

For the purposes of (e), (f) and (g) we will keep your data for up to 3 years, without prejudice to your right to revoke your consent at any time.

Once the retention period has expired, the data will be destroyed or made anonymous.

Please note: If, in the event of litigation, it is necessary to ascertain, exercise or defend the rights of the Data Controller, the retention period of the data collected, for the above-mentioned purposes, may be extended due to the possibility that it may be necessary to prepare defensive elements within this timeframe. In this case, the data will only be kept until the conclusion of the litigation.

5) The security of your personal data

The processing of your data will be carried out by means suitable to guarantee its confidentiality, integrity and availability. The processing is carried out by means of information systems and/or automated systems and will include all the operations or set of operations provided for in Article 4 of the GDPR and necessary for the processing in question, including communication to the persons in charge of the processing itself. The data in question will not be subject to dissemination; instead, it will or may be communicated to public or private entities operating within the scope of the purposes described above.

6) Who can access your personal data

Only authorized persons within the scope of the tasks assigned by Istituto Marangoni S.r.l., including those located outside the European Union, can access your data.

Istituto Marangoni S.r.l. is part of Galileo Global Education Italia. Employees of Galileo Global Education Italia, as well as employees of NABA (Nuova Accademia S.r.l.) and Domus Academy, belonging to the same Galileo Global Education Italia Group, may also have access to some of your data.

Non-economic public entities (e.g. MIUR, Lombardy Region) may also have access to some of your data when the communication is necessary for the performance of the institutional functions of the requesting entity.

Personal data will not be disclosed in any way, it may also be communicated to and processed by third parties duly appointed as Data Processors, such as external collaborators and companies that provide specific instrumental services.

Personal data may also be accessible or may be communicated to parties whose right to access your personal data is recognized by provisions of law or secondary or EU regulations.

7) Where your personal data reside

Your personal data will be managed and stored on servers located within the European Economic Area (EEA) and belonging to the Data Controller and/or to third party companies appointed and duly identified as Data Processors.

Your data may also be processed by the other companies belonging to the Istituto Marangoni group, located outside the European Economic Area (EEA), adopting appropriate security measures to ensure an adequate level of protection.

In addition, some third party companies appointed as Data Processors may transfer your personal data to servers located outside the European Economic Area (EEA). In this case, this will be done in compliance with articles 44 and following of the GDPR, using appropriate safeguards to ensure protection. Further information on these safeguards can be obtained from the Data Controller.

8) Is it mandatory to consent to the provision of your data?

The provision of your data under point 3 a), b), c) e d) is necessary to enter into and execute the contract. For the purposes of point 3 e), f) and g) is optional, if you do not consent you will not be able to learn about our initiatives, events, courses that we will activate.

9) What are your rights in relation to the GDPR?

According to the provisions of the GDPR, Istituto Marangoni S.r.l. guarantees the following rights:

- Right to withdraw consent [Art. 7(3) of the EU Regulation] (Right to withdraw consent given. Note: revocation of consent does not affect the lawfulness of the processing based on the consent before revocation).
- Data subject's right of access [Art. 15 of the EU Regulation] (right to obtain confirmation of the existence or non-existence of personal data relating to him/her and their copy in intelligible form).
- Right to rectification [Art. 16 of the EU Regulation] (right to rectification of inaccurate personal data concerning him/her).

- Right to erasure ("right to be forgotten") [Art. 17 of the EU Regulation] (right to erasure of one's own data. Note: If the data have already been disseminated, i.e. made available to an indeterminate number of recipients - for example, by publication on the website of Istituto Marangoni S.r.l., it may be impossible for Istituto Marangoni S.r.l. to delete/destroy them; therefore, should it be impossible to proceed with the deletion of the data by virtue of what has just been indicated, Istituto Marangoni S.r.l. Will inform you of the reasons why it proves impossible to do so in the present case and will pursue the right to be forgotten).
- Right to restriction of processing [Art. 18 of the EU Regulation] (right to obtain restriction of processing, for example, if the accuracy of the data is disputed or in case of unlawful processing).
- Right to data portability [art. 20 of the EU Regulation] (right to receive in a structured, commonly used and machine-readable format personal data concerning him or her provided to Istituto Marangoni S.r.l. and right to transmit such data to another Data Controller without hindrance by Istituto Marangoni S.r.l. if the processing is carried out on the basis of consent and is carried out by automated means);
- Right to object [Art. 21 of the EU Regulation] (right to object to the processing of one's personal data);
- Right not to be subjected to automated decision-making [Art. 22 of the EU Regulation] (right not to be subjected to a decision based solely on automated processing).

The above rights may be exercised in writing by sending an e-mail to dpo@istitutomarangoni.com. The same contact person may be asked at any time for more information regarding the processing of personal data. It should also be noted that the exercise of one's rights must not prejudice and/or infringe upon the rights and freedoms of others.

Istituto Marangoni S.r.l. undertakes to respond to requests within a period of one month, except in the case of particularly complex requests, for which it may take up to 3 months. In any case, Istituto Marangoni S.r.l. will explain the reason for the wait within one month of the request.

The outcome of the request will be provided in writing (at the request of the interested party) or in electronic format (and, in this case, free of charge). Istituto Marangoni S.r.l. specifies that a possible contribution may be requested from the interested party if his requests are manifestly unfounded, excessive or repetitive: in this regard, Istituto Marangoni S.r.l. will keep track of the requests.

Istituto Marangoni S.r.l., in compliance with art. 19 of the EU Regulation, undertakes to report to the recipients to whom the personal data of the interested party have been communicated any rectification, cancellation or limitation of processing requested by the interested party, where this is possible.

10) Right to lodge a complaint (Art. 77 of the EU Regulation)

If you believe that your rights have been compromised or infringed upon, or that the processing of your data is contrary to applicable law, you have the right to lodge a complaint with the Italian Data Protection Authority in the manner specified by the Authority at the following Internet address: <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524>

11) Data Controller

The Data Controller is: Istituto Marangoni S.r.l. - Via Pietro Verri, 4 20121 Milano MI

Mail: privacy@istitutomarangoni.com

The Data Protection Officer can be contacted at the following e-mail address: dpo@istitutomarangoni.com

12) Updating of this policy

This policy is subject to change. Any substantial changes will be communicated to you by email or through our website.

IM LONDON

PRIVACY POLICY – Updated on 22/07/2025

Information pursuant to art. 13 of EU Regulation 679/16 (GDPR)

1) Why you are receiving this communication

Istituto Marangoni Limited as the Data Controller, wants to inform you about what data it collects and how, so as to ensure that your fundamental rights and freedoms are respected, with particular reference to the confidentiality and security with which the data are processed.

2) What personal data we collect

Istituto Marangoni Limited collects and stores your data:

- Personal and identifying information (such as name, surname, residential address, e-mail address, courses of interest, citizenship, gender, place and date of birth, telephone number, copy of identity document);
- Special categories of personal data such as ethnicity, religious belief, sexual orientation;
- Own bank account and/or the bank account of the person making the payment;
- Educational background/curriculum vitae;

We may ask social channels to send information about our courses based on the profiles of their users and in accordance with their data processing policy, but we are not aware of your name.

3) For which purposes we use your personal data.

Istituto Marangoni Limited uses your data for the following purposes:

- a) To enable you to enroll in the course of your choice, as well as for the provision of related services.
- b) Accrediting you for events related to your training plan.
- c) Respond to your requests for information

In relation to the purposes under 3 a) b) and c) the processing is necessary for the performance of a contract to which you are a party (Art. 6(1)(b) GDPR).

- d) Exercising the rights of the Data Controller.

In relation to the purpose under d), processing is necessary for the pursuit of legitimate interest (Art. 6 par. 1, Lett. f) of the GDPR).

- e) To responds to requests received from HESA (Higher Education Statistics Agency) in order to enable it to conduct an analysis of data on higher education (HE) in the U.K..

In to the purpose under e), your personal data will be used to fulfill a legal obligation pursuant to Art. 6(1) lett. c). Processing of the Special categories of personal data is necessary to fulfil the obligations and exercise the specific rights of the data controller or the data subject in the field of labour law and social security and social protection (Art. 9(2) lett. b) of GDPR).

- f) Contacting you and sending you information about our courses by e-mail or telephone following your requests
- g) Send you information and updates on Istituto Marangoni and your membership via Whatsapp.
- h) For profiling purposes.

In relation to the purposes in (f), (g) (h), the legal basis for processing is your consent (Art. 6(1)(a) GDPR).

4) How long we keep your personal data.

For the purposes mentioned in 3 (a), (b) and (e) we keep your personal data for the duration of the established contractual relationship and beyond the six-year limitation period from the termination of the relationship to fulfill legal obligations as well as for judicial protection purposes.

For the purposes referred to in point (c) and (d) we keep your data for a period not exceeding 12 months from collection.

For the purposes of 3 (f), (g) and (h) we retain your data for up to 3 years, without prejudice to your right to withdraw your consent at any time.

In the event that the registration process, for whatever reason, is not completed, Istituto Marangoni will retain your data for a period of time not exceeding 12 months after collection.

Where a time limit is provided, once it has expired, the data will be destroyed or anonymized.

Please note: If, in the event of litigation, it is necessary to ascertain, exercise or defend the rights of the Data Controller, the period of retention of the data collected, for the above-mentioned purposes, may be extended due to the possibility that it may be necessary to prepare defensive elements within this timeframe. In this case, the data will only be kept until the conclusion of the litigation.

5) The security of your personal data

The processing of your data will be carried out by means suitable to guarantee its confidentiality, integrity and availability. The processing is carried out by means of information systems and/or automated systems and will include all the operations or set of operations provided for in Article 4 of the GDPR and necessary for the processing in question, including communication to the persons in charge of the processing itself. The data in question will not be subject to dissemination; instead, it will or may be communicated to public or private entities operating within the scope of the purposes described above.

6) Who can access your personal data

Only authorized persons within the scope of the tasks assigned by Istituto Marangoni Limited, including those located outside the European Union, can access your data.

Istituto Marangoni Limited is part of Galileo Global Education Italia. Employees of Galileo Global Education, as well as employees of NABA (Nuova Accademia Limited) and Domus Academy, belonging to the same Galileo Global Education Group, may also have access to some of your data.

Personal data will not be disclosed in any way, it may also be communicated to and processed by third parties duly appointed as Data Processors, such as external collaborators and companies that provide specific instrumental services.

Personal data may also be accessible or may be communicated to parties whose right to access your personal data is recognized by provisions of law or secondary or EU regulations.

7) Where your personal data reside

Your personal data will be managed and stored on servers located within the European Economic Area (EEA) and belonging to the Data Controller and/or to third party companies appointed and duly identified as Data Processors.

Your data may also be processed by the other companies belonging to the Istituto Marangoni group, located outside the European Economic Area (EEA), adopting appropriate security measures to ensure an adequate level of protection.

In addition, some third party companies appointed as Data Processors may transfer your personal data to servers located outside the European Economic Area (EEA). In this case, this will be done in compliance with articles 44 and following of the GDPR, using appropriate safeguards to ensure protection. Further information on these safeguards can be obtained from the Data Controller.

8) Is it mandatory to consent to the provision of your data?

The provision of your data under point 3 (a), (b), (c), (d) and (e) is necessary to enter into and execute the contract. For the purposes of point 3 (f), (g) and (h) is optional, if you do not consent you will not be able to learn about our initiatives, events, courses that we will activate.

9) What are your rights in relation to the GDPR?

According to the provisions of the GDPR, Istituto Marangoni Limited guarantees the following rights:

- Right to withdraw consent [Art. 7(3) of the EU Regulation] (Right to withdraw consent given. Note: revocation of consent does not affect the lawfulness of the processing based on the consent before revocation).
- Data subject's right of access [Art. 15 of the EU Regulation] (right to obtain confirmation of the existence or non-existence of personal data relating to him/her and their copy in intelligible form).
- Right to rectification [Art. 16 of the EU Regulation] (right to rectification of inaccurate personal data concerning him/her).
- Right to erasure ("right to be forgotten") [Art. 17 of the EU Regulation] (right to erasure of one's own data. Note: If the data have already been disseminated, i.e. made available to an indeterminate number of recipients - for example, by publication on the website of Istituto Marangoni Limited-, it may be impossible for Istituto Marangoni Limited to delete/destroy them; therefore, should it be impossible to proceed with the deletion of the data by virtue of what has just been indicated, Istituto Marangoni Limited Will inform you of the reasons why it proves impossible to do so in the present case and will pursue the right to be forgotten).

- Right to restriction of processing [Art. 18 of the EU Regulation] (right to obtain restriction of processing, for example, if the accuracy of the data is disputed or in case of unlawful processing).
- Right to data portability [art. 20 of the EU Regulation] (right to receive in a structured, commonly used and machine-readable format personal data concerning him or her provided to Istituto Marangoni Limited and right to transmit such data to another Data Controller without hindrance by Istituto Marangoni Limited if the processing is carried out on the basis of consent and is carried out by automated means);
- Right to object [Art. 21 of the EU Regulation] (right to object to the processing of one's personal data);
- Right not to be subjected to automated decision-making [Art. 22 of the EU Regulation] (right not to be subjected to a decision based solely on automated processing).

The above rights may be exercised in writing by sending an e-mail to dpo@istitutomarangoni.com. The same contact person may be asked at any time for more information regarding the processing of personal data. It should also be noted that the exercise of one's rights must not prejudice and/or infringe upon the rights and freedoms of others.

Istituto Marangoni Limited undertakes to respond to requests within a period of one month, except in the case of particularly complex requests, for which it may take up to 3 months. In any case, Istituto Marangoni Limited will explain the reason for the wait within one month of the request.

The outcome of the request will be provided in writing (at the request of the interested party) or in electronic format (and, in this case, free of charge). Istituto Marangoni Limited specifies that a possible contribution may be requested from the interested party if his requests are manifestly unfounded, excessive or repetitive: in this regard, Istituto Marangoni Limited will keep track of the requests.

Istituto Marangoni Limited, in compliance with art. 19 of the EU Regulation, undertakes to report to the recipients to whom the personal data of the interested party have been communicated any rectification, cancellation or limitation of processing requested by the interested party, where this is possible.

10) Right to lodge a complaint (Art. 77 of the EU Regulation)

If you believe that your rights have been compromised or infringed upon, or that the processing of your data is contrary to applicable law, you have the right to lodge a complaint with the Italian Data Protection Authority in the manner specified by the Authority at the following Internet address: <https://ico.org.uk/make-a-complaint/data-protection-complaints/data-protection-complaints/>.

11) Data Controller

The Data Controller is: Istituto Marangoni Limited - 30 Fashion Street, London, United Kingdom, E1 6PX.

Mail: privacy@istitutomarangoni.com

The Data Protection Officer can be contacted at the following e-mail address: dpo@istitutomarangoni.com

12) Updating of this policy

This policy is subject to change. Any substantial changes will be communicated to you by email or through our website.

IM PARIS

POLITIQUE DE CONFIDENTIALITÉ

Mise à jour le 22/07/2025 Informations conformes à l'art. 13 du Règlement de l'UE 679/16 (RGPD)

1) Raison de la réception de cette communication

Istituto Marangoni France SAS, en tant que responsable du traitement des données, souhaite vous informer sur les données qu'il collecte et la manière dont il le fait, afin de garantir le respect de vos droits fondamentaux et de vos libertés, en mettant particulièrement l'accent sur la confidentialité et la sécurité avec lesquelles les données sont traitées.

2) Les données personnelles que nous collectons

Istituto Marangoni France SAS collecte et conserve vos données :

- Informations personnelles et d'identification (telles que le nom, le prénom, l'adresse résidentielle, l'adresse e-mail, les cours d'intérêt, la citoyenneté, le genre, le lieu et la date de naissance, le numéro de téléphone, une copie du document d'identité) ;
- Compte bancaire personnel et/ou compte bancaire de la personne effectuant le paiement ;
- Parcours éducatif/curriculum vitae.

Les données sont collectées au moment de l'inscription et/ou ultérieurement, par le biais des canaux suivants :

- a) Remplissage du formulaire en ligne.
- b) Formulaires recueillis lors de l'accréditation à la Journée Portes Ouvertes de l'Istituto Marangoni.
- c) Autres événements organisés sur notre campus ou d'autres lieux. Nous pouvons demander aux réseaux sociaux d'envoyer des informations sur nos cours en fonction des profils de leurs utilisateurs et conformément à leur politique de traitement des données, mais nous ne sommes pas informés de votre nom.

3) À quelles fins utilisons-nous vos données personnelles

Istituto Marangoni France SAS utilise vos données à des fins précises:

- a) Vous permettre de vous inscrire dans le cours de votre choix, ainsi que pour la fourniture de services connexes.
- b) Vous accréditer pour les événements liés à votre plan de formation.
- c) Répondre à vos demandes d'informations

En ce qui concerne les finalités 3 a), b), c) le traitement est nécessaire à l'exécution d'un contrat auquel vous êtes partie (Art. 6(1)(b) RGPD).

- d) Exercice des droits du responsable du traitement.

Pour la finalité d), le traitement est nécessaire à la poursuite d'un intérêt légitime (Art. 6 par. 1, Lett. f) du RGPD).

- e) Vous contacter et vous envoyer des informations sur nos cours par e-mail ou téléphone, suite à vos demandes.

- f) Vous envoyer des informations et des mises à jour sur l'Istituto Marangoni et votre adhésion via Whatsapp.

- g) À des fins de profilage.

Pour les finalités e), f), g), la base juridique du traitement est votre consentement (Art. 6(1)(a) RGPD).

4) Durée de conservation de vos données personnelles

Pour les finalités mentionnées au point 3 (a), (b) ci-dessus, nous conservons vos données personnelles pendant toute la durée de la relation contractuelle établie et au-delà de la période de prescription de six ans à compter de la résiliation de la relation, afin de respecter des obligations légales ainsi que pour des motifs de protection juridique.

Pour les finalités mentionnées au point 3 (c) et (d) l'Istituto Marangoni conservera vos données pendant une période n'excédant pas 12 mois après la collecte.

Pour les finalités mentionnées au point 3 (e), (f), (g), nous conservons vos données pendant une période pouvant aller jusqu'à 3 ans, sans préjudice de votre droit de retirer votre consentement à tout moment.

Lorsqu'une limite de temps est spécifiée, une fois expirée, les données seront détruites ou anonymisées.

Veillez noter: En cas de litige, s'il est nécessaire d'établir, d'exercer ou de défendre les droits du responsable du traitement, la période de conservation des données collectées, pour les finalités susmentionnées, pourrait être prolongée en raison de la nécessité de préparer des éléments de défense dans ce délai. Dans ce cas, les données ne seront conservées que jusqu'à la conclusion du litige.

5) La sécurité de vos données personnelles

Le traitement de vos données sera effectué par des moyens propres à garantir leur confidentialité, intégrité et disponibilité. Le traitement s'effectue au moyen de systèmes d'information et/ou de systèmes automatisés et comprendra toutes les opérations ou l'ensemble d'opérations prévues à l'article 4 du RGPD et nécessaires pour le traitement en question, y compris la communication aux personnes chargées du traitement elle-même. Les données en question ne seront pas soumises à une diffusion ; au contraire, elles seront ou pourront être communiquées à des entités publiques ou privées opérant dans le cadre des finalités décrites ci-dessus.

6) Qui peut accéder à vos données personnelles

Seules les personnes autorisées dans le cadre des tâches attribuées par Istituto Marangoni France SAS, y compris celles situées en dehors de l'Union européenne, peuvent accéder à vos données. Istituto Marangoni France SAS fait partie de Galileo Global Education France. Les employés de Galileo Global Education, ainsi que les employés de NABA (Nuova Accademia Belle Arti) et de Domus Academy, appartenant au même groupe Galileo Global Education, peuvent également avoir accès à certaines de vos données. Les données personnelles ne seront en aucun cas divulguées ; elles peuvent également être communiquées et traitées par des tiers dûment désignés en tant que sous-traitants, tels que des collaborateurs externes et des entreprises fournissant des services spécifiques.

Les données personnelles peuvent également être accessibles ou peuvent être communiquées à des parties dont le droit d'accéder à vos données personnelles est reconnu par des dispositions légales, secondaires ou des réglementations de l'Union européenne.

7) Où résident vos données personnelles

Vos données personnelles seront gérées et stockées sur des serveurs situés dans l'Espace économique européen (EEE) et appartenant au responsable du traitement et/ou à des entreprises tierces désignées et dûment identifiées en tant que sous-traitants. Vos données peuvent également être traitées par d'autres entreprises appartenant au groupe Istituto Marangoni, situées en dehors de l'Espace économique européen (EEE), en adoptant des mesures de sécurité appropriées pour garantir un niveau de protection adéquat. De plus, certaines entreprises tierces désignées en tant que sous-traitants peuvent transférer vos données personnelles vers des serveurs situés en dehors de l'Espace économique européen (EEE). Dans ce cas, cela sera fait en conformité avec les articles 44 et suivants du RGPD, en utilisant des garanties appropriées pour assurer la protection. Des informations supplémentaires sur ces garanties peuvent être obtenues auprès du responsable du traitement.

8) Est-il obligatoire de consentir à la fourniture de vos données ?

La fourniture de vos données aux points 3 (a), (b), (c) et (d) est nécessaire pour conclure et exécuter le contrat. Pour les points 3 (e), (f) et (g), c'est facultatif ; si vous ne consentez pas, vous ne pourrez pas être informé de nos initiatives, événements et cours que nous activerons.

9) Quels sont vos droits en relation avec le RGPD?

Conformément aux dispositions du RGPD, Istituto Marangoni France SAS garantit les droits suivants:

- Droit de retirer le consentement [Art. 7(3) du Règlement de l'UE] (Droit de retirer le consentement donné. Note: le retrait du consentement n'affecte pas la licéité du traitement basé sur le consentement avant le retrait).
- Droit d'accès du titulaire des données [Art. 15 du Règlement de l'UE] (droit d'obtenir la confirmation de l'existence ou de l'inexistence de données personnelles le concernant et leur copie de manière intelligible).
- Droit de rectification [Art. 16 du Règlement de l'UE] (droit de rectification des données personnelles inexacts le concernant).
- Droit à l'effacement ("droit à l'oubli") [Art. 17 du Règlement de l'UE] (droit à l'effacement de ses propres données. Note : Si les données ont déjà été diffusées, c'est-à-dire mises à la disposition d'un nombre indéterminé de destinataires - par exemple, par publication sur le site Web d'Istituto Marangoni France SAS -, il peut être impossible pour Istituto Marangoni France SAS de les supprimer/ détruire ; par conséquent, s'il est impossible de procéder à la suppression des données en vertu de ce qui vient d'être indiqué, Istituto Marangoni France SAS vous informera des raisons pour lesquelles il est impossible de le faire dans le cas présent et poursuivra le droit à l'oubli).
- Droit à la limitation du traitement [Art. 18 du Règlement de l'UE] (droit d'obtenir la limitation du traitement, par exemple, si l'exactitude des données est contestée ou en cas de traitement illicite).
- Droit à la portabilité des données [art. 20 du Règlement de l'UE] (droit de recevoir dans un format structuré, couramment utilisé et lisible par machine les données personnelles le concernant fournies à Istituto Marangoni France SAS et droit de transmettre ces données à un autre responsable du traitement sans entrave par Istituto Marangoni France SAS si le traitement est effectué sur la base du consentement et est effectué par des moyens automatisés).
- Droit d'opposition [Art. 21 du Règlement de l'UE] (droit de s'opposer au traitement de ses données personnelles).
- Droit de ne pas être soumis à une décision automatisée [Art. 22 du Règlement de l'UE] (droit de ne pas être soumis à une décision basée uniquement sur un traitement automatisé).

Les droits susmentionnés peuvent être exercés par écrit en envoyant un e-mail à dpo@istitutomarangoni.com. La même personne de contact peut être sollicitée à tout moment pour plus d'informations concernant le traitement des données personnelles. Il convient également de noter que l'exercice de ses droits ne doit pas porter atteinte et/ou enfreindre les droits et libertés d'autrui.

Istituto Marangoni France SAS s'engage à répondre aux demandes dans un délai d'un mois, sauf dans le cas de demandes particulièrement complexes, pour lesquelles cela peut prendre jusqu'à 3 mois. Dans tous les cas, Istituto Marangoni France SAS expliquera la raison de l'attente dans un délai d'un mois à compter de la demande.

Le résultat de la demande sera fourni par écrit (à la demande de la partie intéressée) ou sous forme électronique (et, dans ce cas, gratuitement). Istituto Marangoni France SAS précise qu'une contribution éventuelle peut être demandée à la partie intéressée si ses demandes sont manifestement infondées, excessives ou répétitives : à cet égard, Istituto Marangoni France SAS suivra les demandes.

Istituto Marangoni France SAS, conformément à l'article 19 du Règlement de l'UE, s'engage à informer les destinataires auxquels les données personnelles de la partie intéressée ont été communiquées de toute rectification, annulation ou limitation du traitement demandée par la partie intéressée, lorsque cela est possible.

10) Droit de porter plainte (Art. 77 du Règlement de l'UE)

Si vous estimez que vos droits ont été compromis ou violés, ou que le traitement de vos données est contraire à la loi applicable, vous avez le droit de déposer une plainte auprès de l'Autorité de protection des données, selon la procédure spécifiée par l'Autorité à l'adresse Internet suivante : <https://www.cnil.fr/fr/agir/saisir-la-cn timer>.

11) Responsable du traitement des données

Le responsable du traitement des données est : Istituto Marangoni France SAS - 48 Rue de Miromesnil, 75008 Paris, France. Courriel : privacy@istitutomarangoni.com Le délégué à la protection des données peut être contacté à l'adresse e-mail suivante : dpo@istitutomarangoni.com.

12) Mise à jour de cette politique

Cette politique est sujette à modification. Tous changements importants vous seront communiqués par courriel ou via notre site web.

IM DUBAI

DIFC, United Arab Emirates

INFORMATION PURSUANT TO DIFC DATA PROTECTION LAW NO. 5 of 2020

PRIVACY POLICY – Updated on 23/01/2024

Information pursuant to art. 29 of the DIFC Data Protection Law No. 5 of 2020 ("DIFC Data Protection Law")

1) Why you are receiving this communication

Istituto Marangoni Middle East Limited as the Data Controller wants to inform you about what data it collects and how, so as to ensure that your fundamental rights and freedoms are respected, with particular reference to the confidentiality and security with which the data are processed.

2) What personal data we collect

Istituto Marangoni Middle East Limited collects and stores your data:

- personal and identifying information (such as name, surname, residential address, e-mail address, courses of interest,
- citizenship, gender, place and date of birth, telephone number, copy of identity document)
- own bank account and/or the bank account of the person making the payment;
- educational background/curriculum vitae;

Data are collected at the time of enrollment and/or subsequently, through the following channels:

- a) Web form completion.
- b) Forms collected at the time of accreditation to the Istituto Marangoni Open Day.
- c) Others events organized at our campus or other locations.

We may ask social channels to send information about our courses based on the profiles of their users and in accordance with their data processing policy, but we are not aware of your name.

3) For which purposes we use your personal data

Istituto Marangoni Middle East Limited uses your data for the following purposes:

- a) To enable you to enroll in the course of your choice, as well as for the provision of related services.
- b) Accrediting you for events related to your training plan.

In relation to the purposes under 3 (a) and (b), the lawful basis of processing is that it is necessary for the performance of a contract to which you are a party (Art. 10(1)(b) DIFC Data Protection Law).

- c) Exercising the rights of the Data Controller.

In relation to the purpose under d), processing is necessary for the pursuit of legitimate interest (Art. 10 (f) of the DIFC Data Protection Law).

- d) Contacting you and sending you information about our courses by e-mail or telephone following your requests
- e) Send you information and updates on Istituto Marangoni and your membership via Whatsapp.
- f) For profiling purposes.

In relation to the purposes in (d), (e) (f) the legal basis for processing is your consent (Art. 10(a) of the DIFC Data Protection Law).

4) How long we keep your personal data

For the purposes under 3 (a), (b), (c), we keep your personal data for the duration of the contractual relationship being established and also beyond the six (6) year limitation period from the termination of the relationship in order to fulfil legal obligations as well as for the purposes of legal protection.

In the event that the registration process is not completed for any reason, Istituto Marangoni will retain your data for a period not exceeding 12 months after collection.

For the purposes of (d), (e) and (f) we will keep your data for up to 3 years, without prejudice to your right to revoke your consent at any time.

Once the retention period has expired, the data will be destroyed or made anonymous.

Please note: If, in the event of litigation, it is necessary to ascertain, exercise or defend the rights of the Data Controller, the retention period of the data collected, for the above-mentioned purposes, may be extended due to the possibility that it may be necessary to prepare defensive elements within this timeframe. In this case, the data will only be kept until the conclusion of the litigation.

5) The security of your personal data

The processing of your data will be carried out by means suitable to guarantee its confidentiality, integrity and availability. The processing is carried out by means of information systems and/or automated systems and will include all the operations or set of operations provided for under the definition of "Processing" in the DIFC Data Protection Law and necessary for the processing in question, including communication to the persons in charge of the processing itself. The data in question will not be subject to dissemination; instead, it will or may be communicated to public or private entities operating within the scope of the purposes described above.

6) Who can access your personal data

Only authorized persons within the scope of the tasks assigned by Istituto Marangoni Middle East Limited, including those located outside the Dubai International Financial Centre ("DIFC") , can access your data.

Istituto Marangoni Middle East Limited is part of Galileo Global Education Italia. Employees of Galileo Global Education Italia, as well as employees of NABA (Nuova Accademia Middle East Limited) and Domus Academy, belonging to the same Galileo Global Education Italia Group, may also have access to some of your data.

Non-economic public entities (e.g. MIUR, Lombardy Region) may also have access to some of your data when the communication is necessary for the performance of the institutional functions of the requesting entity.

Personal data will not be disclosed in any way, it may also be communicated to and processed by third parties duly appointed as Data Processors, such as external collaborators and companies that provide specific instrumental services.

Personal data may also be accessible or may be communicated to parties whose right to access your personal data is recognized by provisions of applicable laws or regulations.

7) Where your personal data reside.

Your personal data will be managed and stored on servers located within the European Economic Area (EEA) and belonging to the Data Controller and/or to third party companies appointed and duly identified as Data Processors.

Your data may also be processed by the other companies belonging to the Istituto Marangoni group, located outside the DIFC area, adopting appropriate security measures to ensure an adequate level of protection.

In addition, some third-party companies appointed as Data Processors may transfer your personal data to servers located in other jurisdictions outside the DIFC area by using appropriate safeguards to ensure protection. All transfers of your personal data to Data Controllers or Data Processors outside of the DIFC will be done in accordance with either Art. 26 or Art 27 of the DIFC Data Protection Law, where applicable. Further information on these safeguards can be obtained from the Controller.

8) Is it mandatory to consent to the provision of your data?

The provision of your data under point 3 a), b) and c) is necessary to enter into and execute the contract. For the purposes of

point 3 d), e) and f) is optional, if you do not consent you will not be able to learn about our initiatives, events, courses that we will activate.

9) What are your rights in relation to the DIFC Data Protection Law?

In accordance with the provisions of the DIFC Data Protection Law, Istituto Marangoni Middle East Limited guarantees you the following rights:

- to obtain confirmation of whether or not your personal data is being processed and, if so, obtain access to such data without charge and within one (1) month of the request (Art. 33, Right of access);
- to obtain, without undue delay, without charge and within one (1) month of the request the rectification of inaccurate personal data concerning you (Art. 33, Right to rectification);
- to obtain the erasure of personal data concerning you without undue delay, without charge and within one (1) month of the request Istituto Marangoni Middle East Limited is obliged to erase personal data without undue delay, provided certain conditions apply Art 33, 'Right to be forgotten'); (
- to obtain the restriction of processing in certain cases (Article 35, Right to restriction of processing);
- to receive, in a structured format, in common use and readable by an automatic device, the personal data that you have provided to us and where applicable to transmit it to another Controller (Art. 37, Right to data portability"); - to object at any time, for reasons connected with your particular situation, to the processing of personal data concerning you (Art. 34, Right to object);
- to object at any time, to decisions based solely on automated Processing, including Profiling, which produces legal consequences concerning you or other seriously impactful consequences and to require such decision to be reviewed manually (Art. 38, Right to object to Automated Processing).
- to receive, without undue delay, communication of any personal data breach suffered by Istituto Marangoni Middle East Limited (Art. 42, Notification of Personal Data Breaches to the Data Subject);
- to not be discriminated against by the Data Controller for the exercise of any of your rights under the DIFC Data Protection Law whether through denial of goods or services, charging different prices or rates, or by providing or suggesting a less favorable level or quality of goods or services (Article 39, Non-discrimination)
- to withdraw your expressed consent at any time (Article 32, Right to withdraw consent).

10) Right to lodge a complaint (Art. 60 of the DIFC Data Protection Law)

If you believe that we have not complied with your rights regarding the protection of personal data, you can contact the DIFC Commissioner of Data Protection. Alternatively, if you live in another country, you can contact your local Data Protection Authority.

11) Data Controller

The Data Controller is: Istituto Marangoni Middle East Limited – Gate Village 8, Level 4, DIFC, Dubai, U.A.E.

Mail: privacy@istitutomarangoni.com

The Data Protection Officer can be contacted at the following e-mail address: dpo@istitutomarangoni.com

12) Updating of this policy

This policy is subject to change. Any substantial changes will be communicated to you by email or through our website.

IM SHANGHAI

Privacy Policy - Effective date of latest updated version: November 21st 2024

Istituto Marangoni (Shanghai) Fashion Design Training Center Co., Ltd. ("we") is the operator of this Website <https://www.istitutomarangoni.cn/>. We attach great importance to the protection of personal information and privacy of our users

("you"). When you use our websites, we may collect, use, store and share relevant personal information about you. We hereby make this Privacy Policy ("Privacy Policy") and undertake to strictly process your personal information in accordance with this Privacy Policy.

(I) How we collect and use your personal information

In the course of your use of our websites, we collect your personal information in the following manners:

(1) Completion of Registration and Login for Our Courses

When you complete registration and login to the Website by applying for our courses, we need to collect your name, mobile phone number and other information authorized by you, such as WeChat, Little Red Book, Weibo nickname, and head picture, in order to help you complete your registration and login. You need to provide us with your mobile phone number, in which case we will send an SMS verification code to your mobile phone number to verify the validity of your registered mobile phone number. In accordance with the laws and regulations of our country and for the purpose of security, if you fail to provide your mobile phone number for verification, the registration will fail and you will not be able to use relevant functions of our products and/or services.

(2) Filling out the Website Form

When you visit our website, you are free to fill in any of the forms set up on the website with your first name, last name, e-mail address, phone number, school selection, course selection and other information. It will make it convenient for our staff to contact with you in order to provide you with more pertinent study service.

(3) Call or Communications

When you contact us in real time through the dialogue box on the webpage or by calling the inquiry line, we will record your call information by way of voice recording and manual input, in order to provide you with more pertinent study service. Your personal information, such as your name, gender, nationality, place of birth, date of birth, telephone number, WeChat ID, contact information and interested courses, may be included in or be associated with your communication and interaction with us. By understanding your specific course requirements, we are able to provide you with more pertinent guidance and services.

(4) Use our Official Accounts

When you follow or use our Little Red Book, Weibo and WeChat official accounts, we will collect your mobile phone number, nickname and head picture to set up association with you. Regarding this kind of information, we will obtain your consent according to the personal information collection rules on Little Red Book, Weibo and WeChat official accounts and based on the corresponding prompts.

(5) Activities and Participation

When you attend our training center opening day and other user marketing activities or promotional activities, we will need to provide you with some personal information, such as your name, mailing address and contact information. The personal information may help us to announce the result of the activities, make follow-up publicity for the activities, contact you, recommend products, send gifts and provide services.

(6) Feedback of Opinions

If you have any consultation or suggestion in the process of using our products and/or services, or you need any complaint and feedback, you may contact us by phone or by email so that we can assist you in solving the problem quickly. The feedback may include your name, mobile phone number and relevant information.

(II) How We Use Your Personal Information

1. We will use the personal information we collect for the purposes of our services and in accordance with this Policy. If we use your personal information for purposes other than those described in this Policy or for purposes other than those we collect for specific purposes, we will seek your prior written consent.

2. Please note that all personal information you provide when you use our services will remain vested in us for the duration of your use of our services, unless you delete such information or refuse to allow us to collect such information via your system settings. When you log out from your account, we will cease to use and delete your personal information.
3. We may collect statistics on the usage of the services we provide, and may share these statistics with the public or third parties for purposes of product development, service optimization, or security. However, these statistics do not include any personal information that identifies you.

(III) Other Rules

In accordance with relevant laws, regulations and national standards, we may collect and use your personal information without seeking your prior written consent in the following circumstances:

- (1) Relating to the performance of our obligations as stipulated by laws and regulations;
- (2) Directly related to the security of the state and national defense;
- (3) Directly related to the public safety, public health or major public interest;
- (4) Directly related to criminal investigation, prosecution, examination and approval and execution of judgments;
- (5) In order to protect material legitimate rights and interests such as the life and property of the subject of the personal information or other individual, but it is difficult to obtain the authorized consent of the individual concerned;
- (6) The personal information concerned is opened to the public by the subject of the personal information or his/her guardian on his/her own;
- (7) It is necessary for the execution and performance of contracts according to the requirements of the subject of the personal information;
- (8) Collecting personal information from legally and publicly disclosed information, such as legal news reports, government information disclosure and other channels;
- (9) It is necessary for the safe and stable operation of our products or services provided, such as discovering and disposing of defects of products or services.

IV) How We Store Your Personal Information

1. We will store personal information collected and generated in the course of our operation within China in mainland China. If it is necessary to transfer your personal information to our offshore Affiliate (Istituto Marangoni S.r.l. – registered office in Italy, Milan (MI), Via Pietro Verri, 4, 20121) subject to applicable laws, we will follow the requirements of relevant laws and regulations and shall take necessary measures to ensure the processing of personal information by the offshore Affiliate complies with the laws.
2. We undertake that, unless otherwise required by laws and regulations, we will store your personal information for only the minimum period of time necessary for you to achieve the purposes for which we are authorized to use such information, except as otherwise required by national laws, regulations, rules, regulatory documents or government policies or orders or for the purpose of performing our compliance obligations. For example, the E-commerce Law of the People's Republic of China requires that product and service information, as well as transaction information, shall be stored for no less than three years after the completion of the transaction; the Cyber Security Law of the People's Republic of China requires that technical measures shall be taken to monitor and record the network operation status and cyber security events, and relevant web logs shall be stored for no less than six months. After the storage period expires, your personal information will be deleted or anonymized.

3. If the Company ceases operation due to poor management or for other reasons, unless otherwise required by laws, regulations or regulatory documents, the Company will notify you of such circumstance and promptly stop collecting your personal information, and at the same time delete the personal information already collected or anonymize such information.

V) How We Use Cookies and Similar Technologies

1. Cookies are text files that are stored on or saved by an Internet browser on a user's end device. Through the use of cookies, we provide our users with a secure and personalized service experience. Cookies are stored on a user's operating system when the user visits the Site. When the user visits the Site again, we use cookies that clearly identify the browser that the user is using.
2. We will not use cookies for any purpose other than the purposes stated in this Policy. You can manage or delete cookies according to your own preferences. The Help section of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have your browser notify you when you receive a new cookie, or how to disable most types of cookies. You can clear all saved cookies on your computer. Most web browsers automatically accept cookies, but you can usually change your browser's settings to reject cookies if you want, or you can clear all saved cookies on software. If you do this, you may need to change your user settings each time you visit the Site, and any information you previously recorded will be deleted, which may affect the security of the services you use. If you wish to know more about the use of cookies, please refer to the cookies rules published on the Site.
3. Third party partners' collection and use of your information through cookies are not governed by this Policy, but rather by the third party's own information protection statement. We are not liable for cookies or similar technologies used by third parties.

VI) How do we share, transfer and publicly disclose your personal information

1. Engagement

We may engage a third party service provider to process the personal information we collect to provide products or technical support to us on infrastructure technology, data analytics, advertising, marketing decisions, etc. Such engagement shall be governed by the purposes stated in this Policy. We may monitor the engagement and sign confidentiality agreements with such third party service providers which require them to establish and enforce confidentiality and security measures for personal information in accordance with national laws, regulations and standards at a level not lower than that set forth in this Policy.

2. Sharing Information

- (1) Has your express prior consent or authorization or has you request us to share your personal information with third parties by e-mail or otherwise;
- (2) Is required by applicable laws and regulations or is compulsorily requested by competent governmental authorities;
- (3) Sharing with Our Affiliates: We may share your personal information with our Affiliates; provided, however, that we will only share the personal information necessary and subject to the stated purposes in this Policy; and that such Affiliates also implement equivalent security safeguards to safeguard your personal information in accordance with this Policy.

3. Transfer

We will not transfer your personal information to any other company, organization or individual, provided, however, that in the event of a merger, acquisition, transfer of assets or insolvency, we will notify you of any transfer of personal information and require the new company or organization holding your personal information to continue to be subject to this Policy. Otherwise, we will require the new company or organization to obtain your consent again.

4. Public Disclosure

Unless otherwise provided in this Agreement or expressly required by law, we will not make public disclosure of your personal information.

5. Exceptions

In addition, in accordance with applicable laws and national standards, we may share, transfer or publicly disclose personal information under the following circumstances without your prior written consent:

- (1) Relates to the performance of our obligations under laws and regulations;
 - (2) Directly relates to national security and the security of national defense;
 - (3) Directly relates to public safety, public health or material public interest;
 - (4) Where the case is directly related to criminal investigation, prosecution, trial and judgment execution, etc.;
 - (5) In order to protect the life, property and other material legitimate rights and interests of the person making the personal information or other individual, but it is difficult to obtain the authorization of the individual concerned;
 - (6) The personal information that the person making the personal information or his/her guardian discloses to the public on his/her own;
 - (7) Collecting personal information from legally and publicly disclosed information, such as legal news reports, government information disclosure or other channels.
6. Please note that, the information that you voluntarily share or even publicly share when using our service may involve personal information of you or others or even personal sensitive information. Please be cautious with any sharing or disclosure. If the personal information involved involves another person's personal information, please obtain that person's consent before any sharing or disclosure.
7. Please note that, according to law, if we take technical measures and other necessary measures to process personal information to make it impossible for the recipient to re-identify a specific individual and impossible to recover the same, the sharing, transfer and public disclosure of personal information after such process is not required to notify you and obtain your consent further.

VII) How do we protect your personal information

We attach great importance to the security of personal information and take all reasonable and practical measures to safeguard your personal information.

1. We have adopted common data protection technology and management measures, such as network segregation, data encryption and employee access control, to protect such information from unauthorized access, disclosure, tampering, loss or destruction.
2. You should be aware that, although we will endeavour to ensure and guarantee the security of any information you send to us, the Internet environment is not 100% secure and we are not responsible for any risk or loss arising therefrom or in connection with it.
3. If any personal information security incident occurs, we will promptly inform you of the following in accordance with the requirements of the laws and regulations: basic information and possible impacts of the security incident, measures we have taken or will take in response thereto, suggestions for prevention and reduction of the risks on your own and remedial measures against you. We will inform you of the relevant information of the incident in a timely manner by means of application sending, email, short message, telephone, etc., and if it is difficult to inform personal information subjects one by one, will take reasonable

and effective ways to publish a public announcement. Meanwhile, we will also report the responses to personal information security incidents proactively as required by regulatory authorities.

VIII) How do you manage your personal information

During your use of instant messenger, you may check, correct or delete your personal information, and exercise the right to change the scope of consent and cancel the account, by contacting us through the corresponding page prompts or otherwise as set out in this privacy policy, and your opinion will be processed in a timely manner.

1. Access and correction of your personal information

If you would like to access or correct your personal information, you may contact us in the manner as set out in this privacy policy, and we will respond to your request promptly.

IX) Deleting your personal information

Under the following circumstances, you may make a request to us to delete personal information in the manner as set out in this privacy policy:

- (1) We collect or use personal information in violation of laws, administrative regulations or the agreement reached with you;
- (2) If we share or transfer your personal information with any third party in violation of laws, administrative regulations or the agreement reached with you, we will immediately stop sharing or transferring such information, and notify such third party to delete such information immediately;
- (3) If we publicly disclose your personal information in violation of laws, administrative regulations or the agreement reached with you, we will immediately stop public disclosure of such information and send a notice to the relevant recipients to delete the corresponding information;
- (4) You stop using our products or services, or you cancel your account, or we terminate services and operations.

X) Modifying or revoking your authorization

Your consent to grant authorization may be revoked at any time provided that all the transactions on your registered account are completed without any complaints, disputes or other circumstances that require access to your personal information. You may not be able to use the corresponding business functions for receiving services after revocation of your authorization. If we are required to continue to store your personal information according to the applicable laws, regulations and regulatory provisions, we will continue to store and use such information in accordance with the law. In principle, we will no longer process your personal information after you revoke your authorization; provided, however, that the revocation shall not affect our processing of personal information based on your consent prior to the revocation.

If you do not wish to accept the commercial advertisements sent to you by us, you may cancel the subscription at any time by the following method: SMS/Email. But except where we send messages in accordance with the laws, regulations or regulatory provisions.

XI) Cancellation of account

If you wish to close your account, you may contact us in the manner as set out in this privacy policy, and we will respond to your request promptly.

It is irreversible for you to close your account, and we will not provide you with any products or services, will no longer collect personal information from you, and will delete or anonymize personal information related to your account upon your request.

XII) Responding to your request

If you are not able to exercise your rights in the above manner, you may contact us using the contact method set out in this privacy policy. For security purposes, you may be required to provide a written request or otherwise identify yourself. We may ask you to verify your identity prior to processing your request.

In principle, we will not charge any fees for reasonable requests, but we may charge a certain amount of cost for repeated requests that exceed reasonable limits. We may refuse requests that are needlessly repetitive, overly technical, pose risks to the legitimate rights and interests of others, or are unreasonably impractical.

XIII) How we handle minors' personal information

We attach great importance to the protection of minors' personal information. According to relevant laws and regulations, the collection and use of a minor's personal information under the age of 14 requires the authorization and consent of the guardian; the collection and use of a minor's personal information between the age of 14 and the age of 18 requires the authorization and consent of the guardian or the guardian itself.

If you are a minor (especially if under the age of 14), we ask that you ask your parent or other guardian to review this Privacy Policy carefully and that you ask your parent or other guardian to use our services or provide information to us with the authorized consent of your guardian.

If you are the guardian of a minor, please pay attention to whether the minor is using our products or services after you have authorized such use. If you have any questions about the personal information of a minor, please contact us in the manner set out in this privacy policy.

XIV) How this privacy policy is updated

Our privacy policy is subject to change in due course. We will post any changes we make to this privacy policy on this page. We may, however, provide more conspicuous notice of material changes (we may explain specific changes by giving a special notice on the page you visit). We will not impair any of your rights under this privacy policy without your express consent.

Material changes defined in this privacy policy include, but are not limited to, material changes in our service model; material changes in the number of individuals to whom the personal information is shared, transferred or publicly disclosed; material changes in your rights to participate in the processing of personal information and the manner in which you exercise them; changes in our contact information and channels for reporting complaints; or any other circumstances in which the personal information security impact assessment indicates a high risk.

We also keep on file previous versions of this privacy policy for your reference.

XV) How to contact us

If you have any questions regarding this Policy or the protection of personal information, you may direct your written question, comment or suggestion to our customer service at the following address:

Name: Istituto Marangoni (Shanghai) Fashion Design Training Center Co., Ltd.

Address: Floor 7, office building T1, The roof,Lane458,Madang Road,Huangpu District,Shanghai

Telephone : 021-6288 0280

Email: privacy@istitutomarangoni.com

shanghai@istitutomarangoni.com

Generally, we will reply within fifteen (15) business days. If you are not satisfied with our reply, in particular, our act of processing personal information harms your lawful rights and interests, you can file a complaint or report to regulatory authorities such as cyberspace administration, telecommunication administration, public security administration and industry and commerce administration, or seek solution by filing a lawsuit in the competent court where the defendant resides.