

Effective Date: December 1, 2020

CLICK TO BUY PRIVACY POLICY

WHAT DOES THIS CLICK TO BUY PRIVACY POLICY APPLY TO?

This Click to Buy Privacy Policy (“Privacy Policy”) and the Cookie Policy (<https://www.pirelli.com/tires/en-us/cookie-policy>) apply to the personal information collected by Pirelli North America, Inc. or any of its affiliates (hereinafter “Pirelli”, “we”, “us” or “our”, as appropriate) about you through the Click to Buy service on www.pirelli.us (<http://www.pirelli.us>) (hereinafter the “Site”) or through any other means, owned or used by Pirelli, that links to this Privacy Policy. This Privacy Policy only applies to the Click to Buy service. For more information about how Pirelli collects and uses information more generally, visit our privacy policy located at <https://www.pirelli.com/tires/en-us/privacy-policy> (the “General Privacy Policy”).

The Site is not intended for children under the age of 13. If you are under the age of 13, please do not attempt to register with us at the Site or provide any personal information about yourself to us. If we learn that we have collected personal information from a minor, we will promptly delete that information. If you believe we have collected personal information from a minor, please contact us at email address and phone number indicated below.

WHAT PERSONAL INFORMATION DO WE COLLECT?

Categories of personal information collected by us from your use of the Site are the following:

- a) zip code or other geographic information
- b) vehicle and tire information such as vehicle year, brand and model
- c) any other information provided by you

As part of your use of the Site, you may be directed to the website of a third party such as a dealer or distributor in order for you to order merchandise or undertake another transaction (such activities are referred to in this Privacy Policy as a “transaction”). As discussed below, Pirelli is not responsible for information collected by any third parties. In addition to information listed above, such third parties may obtain additional information in connection with a transaction such as:

- a) contact details such as name, email address, phone number, physical address
- b) identifiers such as name, date and place of birth, account information, etc.
- c) purchase history information
- d) device information such as device identifiers, settings, network information.

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

Most of the personal information we process is collected directly from you, your browser or internet service provider (see our Cookie Policy regarding data collected from cookies), or is collected when you

browse the Site or fill out the forms that are present within them, adhere to promotions or programmes reserved to you, at events or other initiatives and, in general, whenever you interact with us. We may also collect your personal information from other Pirelli Group companies to which you have provided it, in order to merge it with the one collected by us, as well as from our business partners and other third parties.

FOR WHICH PURPOSES DO WE PROCESS YOUR PERSONAL INFORMATION?

The Site is intended to collect a limited amount of information specific to the Click to Buy service. For information about our general purposes for processing information, visit the General Privacy Policy. For purposes of the Site, we may process personal information to:

1. Answer your questions and fulfil your information requests
2. Allow you to take part in initiatives, events or competitions organized, promoted or sponsored by us
3. Allow us to facilitate transactions between you and third parties, such as dealers or distributors
4. Merge them with the data that you have provided to other Pirelli Group companies
5. Analyze your profile in order to tailor your experiences with our services and provide you more relevant advertising on and off our services
6. Send you promotional, marketing or advertising and other information that may be of interest based on your preferences and social media advertising through social media platforms such as Facebook or Instagram
7. Comply with legal or regulatory obligations to which we are subject
8. Exercise or defend legal claims in judicial, administrative or arbitration procedures
9. Carry out activities connected to the execution of extraordinary transactions.

HOW DO WE STORE YOUR PERSONAL INFORMATION?

We securely store your personal information at our or our service providers' data centers in the European Union, adopting reasonable measures to keep it safe.

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We keep your personal information as long as it is necessary for the purposes for which they were collected or as long as we are required to keep them in accordance with applicable laws and regulations. Where permitted by local law, we may retain it for longer periods for our own internal review and operations.

WITH WHOM YOUR PERSONAL INFORMATION IS SHARED?

Your personal information may be shared with:

1. other Pirelli Group companies;
2. service providers such as marketing agencies, travel agencies, event organizers and IT providers;
3. business partners, such as advertising tech providers (see our Cookie Policy);
4. government authorities;
5. potential buyers;
6. third parties in connection with transactions.

Both other Pirelli Group companies and third parties, which act as service providers or are involved in transactions with you, are bound by data protection obligations aimed at ensuring an adequate level of protection to your personal information. All of the information listed above may be shared with Pirelli Group companies and such third parties. We make available to you products and services provided by third parties through the Site. If you click on a link as part of a transaction, you may be notified that you are going to a third party site. In those cases, you should read the terms of service and privacy policy of the third party site, as we are not responsible for those sites or any transactions. We may, however, share your personal information related to those transactions with that third party. Any purchases made from a third party dealer or distributor are between you and the dealer or distributor, under terms and conditions and privacy policies of such dealer or distributor, and not between you and us. We are only helping you find products and making it easier to buy them from a dealer as a convenience for you.

YOU CONSENT TO THE COLLECTION, USE, AND TRANSFER BY US TO THIRD PARTY DEALERS AND DISTRIBUTORS AND BY THIRD PARTY DEALERS AND DISTRIBUTORS TO US OF THE INFORMATION DESCRIBED IN THIS PRIVACY POLICY, AND YOU RELEASE US AND THE THIRD PARTY DEALERS AND DISTRIBUTORS FROM AND AGAINST ANY AND ALL CLAIMS OR LIABILITIES ARISING OUT OF THE COLLECTION, USE, AND TRANSFER OF THIS INFORMATION.

We may also disclose any of the categories of personal information above to courts, law enforcement agencies or governmental authorities, or authorized third parties, if and to the extent we are required or permitted to do so by law or by court orders.

Furthermore, in the event we intend to sell or transfer ownership or control of any or all of our business, operations or services to a third party, we reserve the right to disclose your personal information to a potential buyer both before and after the purchase. In the event that sale does not go through, we will require the potential purchaser to not use or disclose your personal information in any manner whatsoever and to completely erase the same.

We inform you that some of the Pirelli Group companies and the service providers to which we disclose your personal information are established outside your home country. If your information is transferred outside of your home country, we will ensure that your personal information continues to be protected in compliance with this Privacy Policy, subject to the laws applicable there. While we take steps to protect your privacy, the data protection and other laws of other countries might not be as comprehensive as those in your country. By using the Site or our services, you understand and agree that your information may be transferred outside of your home country and to third parties with whom we share it as described in this Privacy Policy.

YOUR RIGHTS UNDER THE DATA PROTECTION LAW

For information about your rights under data protection laws, please refer to the General Privacy Policy. Please note that you are providing us any personal information so that you may undertake whatever transaction you, alone, may determine. The role of the Site is to assist you in locating a third party to undertake a transaction.

Your browser may offer you a “Do Not Track” (“DNT”) option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. Given the divergent practices of organizations that offer browsers and the lack of a standard in the marketplace, we generally do not respond to DNT signals at this time.

WHAT ABOUT THE SALE OF YOUR PERSONAL INFORMATION?

We do not and will not sell, rent or otherwise disclose your personal information collected by us to third parties. Therefore, in the past 12 months, we have not “sold” your personal information. Information that you provide to a third party as part of a transaction is subject to the terms of service and privacy policies of the third party. The third party may, in turn, provide Pirelli or others with information about you for various purposes. Please review the third party’s privacy policies and our General Privacy Policy for more information about your information and any rights that you may have in it.

HOW CAN YOU CONTACT US?

You can contact us by phone and email.

Our phone number: **1-800-747-3554**

Our email address: Privacy.Nafta@pirelli.com

LINKS TO OTHER WEBSITES

The Site may contain links to external websites. If you click on any of these links, you will be directed to a website not covered by this Privacy Policy.

CHANGES TO THE PRIVACY POLICY

We may review this Privacy Policy at our own discretion. Make sure to check the latest version available on the Site regularly.