

# Compliance Policy

Ed. 2022 REV. 00 OF 2022/03/01

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## 1. COMPLIANCE POLICY

### DIVERSITY, EQUITY & INCLUSION

Nikysa is a full-service digital agency based in Switzerland, where diversity, equity, and inclusion are at the heart of our corporate practices and culture. We believe that we give our best when everyone is engaged and contributing to a more diverse and inclusive workplace.

We transform brands and build business through strategy, design, and technology. The kind of work that unlocking opportunity to drive positive impact for your brand—and for the world around us.

When you work with us, you get a team obsessed with bringing together the best in creative and communication thinking. That's what gets us up every day, to work with you to make ground heart-racing moves.

## 2. INTRODUCTION PRIVACY POLICY OF THE WEBSITE

### PROTECTION OF COPYRIGHT

The contents of the pages of the NIKYSA site are the intellectual property of NIKYSA itself. All rights reserved. The contents of the pages of the site <https://nikysa.com> and of the connected or similar domains cannot, in whole or in part, be copied, reproduced, transferred, uploaded, published or distributed in any way without the prior written consent of NIKYSA, without prejudice to the possibility of storing them on your computer or printing extracts from the pages of the site for personal use only. The brands and logos that appear on this site are the property of NIKYSA. They cannot be used on any website other than the NIKYSA site without the prior written consent of NIKYSA. The NIKYSA brand and any brand that includes the NIKYSA brand cannot be used as internet addresses of other sites, or as parts of such addresses, without the prior written consent of NIKYSA.

### LIMITS OF LIABILITY

The information contained on the site is provided in good faith and NIKYSA believes it to be accurate. Under no circumstances will NIKYSA be held responsible for any direct or indirect damage caused by the use of the site. The information contained on the site may be technically inaccurate or vitiated by typographical errors. The information can be changed or updated without notice. NIKYSA can also improve, change or delete some sections of the site, without notice.

### COMMERCIAL RELATIONS AND LINKS TO THE SITE

NIKYSA assumes no responsibility for materials created or published by third parties with which the NIKYSA site has a link. Anyone who decides to visit a site linked to the NIKYSA site does so at their own risk, assuming the burden of taking all necessary measures against viruses or other intrusive or destructive elements. Linking to

other sites does not imply that NIKYSA sponsors or is affiliated with the entities that perform the services described in those sites.

#### **INFORMATION RECEIVED FROM NIKYSA**

Any material sent to NIKYSA, for example via e-mail or through the web pages, will be deemed to be of a non-confidential nature. NIKYSA will have no obligations of any kind with respect to such material and will be free to reproduce it, use it, reveal it, show it, transform it, make derivative works of it and distribute it to third parties, without limits. Furthermore, NIKYSA will be free to use all ideas, concepts, know-how or technical knowledge contained in such material, for any purpose, including, without being limited to, the development, production and marketing of products using such material. Anyone who sends material guarantees that it is publishable and agrees to hold NIKYSA harmless from any action by third parties in relation to such material.

#### **COOKIES**

A "cookie" (ie a small data file that some websites, while being visited, can send to the visitor's address) may be located somewhere on the NIKYSA site, in order to trace the visitor's paths on the site. If you prefer not to receive cookies, you can set your browser to warn you of the presence of a cookie and then decide whether to accept it or not. You can also automatically refuse all cookies by activating the appropriate option in your browser. See point 13. Cookie Policy of this Compliance Policy, in accordance with the clarifications of the Privacy Guarantor of 8 May 2014.

### **3. PRIVACY POLICY**

This information is provided pursuant to art. 13 of the "Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, concerning the protection of individuals with regard to the processing of personal data, as well as the free circulation of such data", 2016/679 / EU (for brevity, the "GDPR"). This information is also valid for the purposes of Legislative Decree 101/2018, which amended Legislative Decree 196/2003 "Code regarding the protection of personal data". The site management methods are described both with reference to the processing of the personal data of users who consult it, and the data that may be sent spontaneously by visitors to the site, accessible electronically starting from the addresses pertaining to NIKYSA. This information is provided only for the sites and activities of NIKYSA and not for other websites that may be consulted by the user through links and / or activities carried out by third parties.

### **4. PLACE OF DATA PROCESSING**

The treatments relating to the site indicated above take place at the aforementioned headquarters of the Data Controller and are handled by the Data Controller, by persons appointed for this purpose, or by persons in charge

of occasional maintenance operations. The website is hosted (hosted) in facilities for which the company has previously verified compliance.

## **5. TYPES OF DATA PROCESSED**

### **NAVIGATION DATA**

The computer systems and software procedures used to operate the site acquire, during their normal operation, some personal data, the transmission of which is implicit during the operation of the internet communication protocols.

### **DATA PROVIDED VOLUNTARILY BY THE USER**

Personal data that may be sent spontaneously to NIKYSA by visitors to the site will be treated according to principles of correctness, lawfulness and transparency, for the protection of the privacy and rights of the interested parties. In accordance with Article 13 of the GDPR, appropriate information will be given to the subjects who provide data and, in cases where it is required, a specific form for requesting consent will be proposed. The data that require explicit consent will be processed by NIKYSA only following the express release of the same consent by the interested party.

## **6. PURPOSE**

Personal data (hereinafter referred to simply as "Data") may be used for purposes commercial, promotional, as well as for statistics on the quality of services rendered and to identify the potential customers of each product and service, as well as to forward - by letter, telephone, fax, automated systems, etc. - information both of a technical / general nature and of a commercial / promotional nature of products and services of our company or of the subjects appointed by it, to whom the aforementioned data is communicated for this purpose. Personal data, spontaneously sent by interested parties, may be disclosed to third parties, only in cases in the information adopted by NIKYSA. The optional, explicit and voluntary sending of e-mails to the addresses indicated on this site entails the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data included in the message. Specific summary information will be progressively reported or displayed on the pages of the site set up for particular services that may gradually be implemented.

## **7. OPTIONAL PROVISION OF DATA**

Apart from that specified for navigation data, the visitor is free to provide their personal data. The user can also send their suggestions and comments to the specified addresses.

## **8. METHOD OF TREATMENT**

In any case, without prejudice to the obligations of a deontological nature, the processing of data will take place in accordance with the provisions of the GDPR and can be carried out both manually and with the aid of IT and telematic means. In fact, the data may be stored both in paper archives and in electronic archives, in order to allow, where necessary, the identification and selection of aggregate data, for a time not exceeding the duration and the need for treatment. Following periodic checks, the Data Controller will verify the strict relevance and non-excess of the data collected with respect to the obligations and purposes of the processing. Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access.

## 9. COMMUNICATION AND DISSEMINATION

The personal data of the interested party will not be disclosed, unless this is the subject of a specific request by the interested party.

## 10. RIGHTS OF THE INTERESTED PARTIES

The subjects to whom the personal data refer enjoy the rights provided for by the GDPR. The ownership of the data processing, which is the subject of this information notice, is the responsibility of: Cindy Martine Group Sagl Corso Elvezia, 35 6900 Lugano, Swiss. Any requests for access to data can be sent to the Data Controller via e-mail [press@nikysa.com](mailto:press@nikysa.com)

The subjects to whom the personal data refer enjoy the rights provided for by the GDPR listed in art. 13 co. 2 of Regulation (EU) 2016/679.

The site <https://nikysa.com> informs the interested party about the existence:

- the right of the interested party to ask the holder for access to personal data, their updating, rectification, limitation of the processing of data concerning him, or to oppose, for legitimate reasons, their treatment, in addition to the right to data portability;
- the right to request the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those that do not need to be kept for the purposes for which the data were collected or subsequently processed;
- the right to obtain certification that the updating, rectification, blocking, transformation operations 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 fulfillment proves impossible or involves a disproportionate use of means compared to the protected right.

Requests can be addressed to the data controller at his email address (without formalities) or using the model provided by the Guarantor for the protection of personal data.

In case of violation of the law, the user has the right to lodge a complaint with the Guarantor for the Protection of Personal Data, as the authority responsible for monitoring the processing.

The ownership of the data processing, object of this disclosure, belongs to: **CINDY MARTINE GROUP Sagl Corso Elvezia, 35 6900 Lugano, Swiss**. Any requests for access to data can be sent to the Data Controller via e-mail [press@nikysa.com](mailto:press@nikysa.com).

## 11. COOKIE POLICY

Cookies are small text strings that the sites visited by the user send to their terminal (usually the browser), where they are stored before being re-transmitted to the same sites at the next visit by the same user. While browsing a site, the user can also receive cookies on his terminal that are sent from different sites or web servers (so-called "third parties"), on which some elements may reside (such as, for example, images, maps, sounds, specific links to pages of other domains) present on the site that the same is visiting. The website <https://nikysa.com> (hereinafter, the "site") uses cookies to make your services simple and efficient for users who view the pages of the Site. Users who view the site will see inserted minimum amount of information in the devices in use, whether they are computers and mobile devices, in small text files called "cookies" saved in the directories used by the user's web browser. There are various types of cookies, some to make the use of the site more effective, others to enable certain features. By analyzing them in detail, our cookies allow you to:

- memorize the preferences entered by the visitor;
- avoid re-entering the same information several times during the visit, such as username and password.

The processing is carried out by the Data Controller with automated tools. With the exception of technical cookies, strictly necessary for normal navigation, the provision of data is left to the will of the visitor who decides to browse the site after having read the information in short form (cd banner) and to use the services that involve the installation of cookies. The user can therefore avoid the installation of cookies, except for technical cookies, by refraining from taking any action in correspondence with the banner or through the special functions available on the different browsers, described in detail in this information.

## 12. TYPES OF COOKIES USED BY THE SITE

### TECHNICAL COOKIES (MANDATORY)

This type of cookie allows certain sections of the site to function correctly. They are of two categories: persistent and session:

- persistent: once the browser is closed they are not destroyed but remain up to one preset expiration date;
- of sessions: they are destroyed every time the browser is closed.

These cookies, always sent from our domain, are necessary to view the site correctly and in relation to the technical services offered, they will therefore always be used and sent, unless the user changes the settings in his browser (thus affecting some features or viewing the pages of the site). The site, according to current legislation, is not required to seek consent for technical and analytics cookies that do not allow the user to be identified, as they are necessary to provide the required services.

For all other types of cookies, consent can be expressed by the User with one or more of the following methods:

- by accepting and expressly withdrawing consent to the use of cookies within the site. Use the settings opposite to change your preferences;
- through specific configurations of the browser used or the related computer programs used to navigate the pages that make up the site;
- by changing the settings in the use of third-party services.

The aforementioned solutions may prevent the user from using certain features or viewing parts of the site.

### **13. WEBSITE AND THIRD PARTY SERVICES**

The site may contain links to other Web sites that have their own privacy policy which may be different from that adopted by the site and therefore not responsible for these sites. For example, the site may report links to NIKYSA social pages, such as Facebook, Instagram, Twitter, Google+, LinkedIn, Pinterest and Youtube. It should be noted that clicking on the links to these social networks could lead to the installation of cookies by such third parties. For more information, please refer to the respective information on the use of cookies.

### **14. HOW TO DISABLE COOKIES BY CONFIGURING THE BROWSER**

#### **CHROME**

1. Run the Chrome Browser
2. Click on the menu in the browser toolbar next to the URL entry window for navigation
3. Select "Settings"
4. Click "Show Advanced Settings"
5. In the "Privacy" section, click on the "Content settings" button
6. In the "Cookies" section you can change the following cookie settings:
  - allow data to be saved locally;
  - modify local data only until the browser is closed;
  - prevent sites from setting cookies;
  - block third-party cookies and site data;
  - manage exceptions for some internet sites;
  - delete one or all cookies.



For more information visit the dedicated page.

#### **MOZILLA FIREFOX**

1. Run the Mozilla Firefox browser
2. Click on the menu in the browser toolbar next to the URL entry window for navigation
3. Select "Options"
4. Select the "Privacy" panel
5. Click "Show Advanced Settings"
6. In the "Privacy" section, click on the "Content settings" button
7. In the "Tracking" section it is possible to change the following cookie settings:
  - richiedere ai siti di non effettuare alcun tracciamento;
  - comunicare ai siti la disponibilità ad essere tracciato;
  - non comunicare alcuna preferenza relativa al tracciamento dei dati personali.
8. From the "History" section you can:
  - enabling "Use custom settings", select to accept third-party cookies (always, from the most visited sites or never) and to keep them for a specified period (until they expire, when Firefox is closed or to ask every time);
  - remove the individual cookies stored.

For more information visit the dedicated page.

#### **INTERNET EXPLORER/EDGE**

1. Run the Internet Explorer / Edge Browser
2. Click on the "Tools" button and choose "Internet Options"
3. Click on the "Privacy" tab and in the "Settings" section change the slider according to the desired action for cookies:
  - block all cookies;
  - allow all cookies;
  - select the sites from which to obtain cookies. Move the cursor to a position intermediate in order not to block or allow all cookies, then click on "Sites", enter a website in the "Web Site Address" box and then press "Block or Allow".

For more information visit the dedicated page.

#### **SAFARI 6**

1. Run the Safari Browser

2. Click on "Safari", select "Preferences" and click on "Privacy"
3. In the "Block Cookies" section, specify how Safari must accept cookies from websites
4. To see which sites have stored cookies click on "Details"

For more information visit the dedicated page.

#### **SAFARI IOS (MOBILE DEVICES)**

1. Run the iOS Safari Browser
2. Tap on "Settings" and then "Safari"
3. Tap on "Block Cookies" and choose from the various options: "Never", "From third parties and advertisers" or "Always"
4. To delete all cookies stored by Safari, tap on "Settings", then on "Safari" and finally on "Delete Cookies and data"

For more information visit the dedicated page.

#### **OPERA**

1. Run the Opera Browser
2. Click on "Preferences" then on "Advanced" and finally on "Cookies"
3. Select one of the following options:
  - accept all cookies;
  - accept cookies only from the site you visit: third-party cookies and that come sent from a domain other than the one you are visiting will be rejected;
  - never accept cookies: all cookies will never be saved.

For more information visit the dedicated page.