

TRACKTRIBE PRIVACY NOTICE ON PERSONAL DATA PROCESSING

- pursuant to articles 13 –14 Reg (UE) 2016/679 on personal data protection -

This Privacy Notice (“**Notice**”) describes how Brembo N.V. (“**Brembo**” or the “**Company**”) processes the personal data of users of the TrackTribe mobile application (“**App**”). The Company processes personal data in accordance with Regulation (EU) 2016/679 – General Data Protection Regulation (“**GDPR**”), Italian Legislative Decree 196/2003 (as amended), and other applicable local laws, as amended or replaced (collectively, “**Applicable Privacy Laws**”).

1. Identity and contact details of the Controller and contact of the Data Protection Officer

The Data Controller is Brembo N.V., with legal seat in Amsterdam, the Netherlands, and with business and corporate address in Bergamo, via Stezzano n. 87 – 24126, Italy, phone number 035.6052111.

The Data Protection Officer (DPO) is available at the following e-mail address privacy@brembo.com.

2. TrackTribe project and its target audience

TrackTribe is designed for passionate motorcyclists who want to analyse and improve their track performance using the Device Kit and App developed by Brembo Racing. The system allows users to collect telemetry data related to their riding experience during track sessions on selected circuits, monitor overall riding performance, and generate track reports for each session, with a particular focus on braking style and other parameters useful for technical improvement. To use the service, the user must independently activate the Bluetooth connection with the device installed on the motorcycle, select the relevant circuit via the App, and have an Internet connection to access the service’s features. Users may also choose to compare their performance with that of other riders and share their results and videos of their sessions within the TrackTribe community.

Please note that **the App is intended for users who are of legal age. The Company does not knowingly collect information from minors. If you are a parent or legal guardian and believe that the Company may be in possession of personal information from or relating to your minor child, please contact us at privacy@brembo.com. Please be advised that the Company has implemented certain measures to mitigate the risk of registration by users who do not meet the minimum age requirement; however, it is not possible to completely eliminate this risk, and therefore the Company undertakes to promptly delete any account belonging to a minor that is reported to us.**

3. Types of personal data, purposes of the processing and legal basis

Brembo processes the following categories of personal data for the purposes and on the legal bases set forth below.

N.	Purposes	Legal Basis	Personal data
1	Allow the user to use the App and its features, including: <ul style="list-style-type: none">· account creation and login authentication;· performance tracking;· creation of track session reports and suggestions;	The legal basis of the processing is the performance of a contract (Article 6, par. 1, lett. b of the GDPR). If the user wants to upload videos, the App requests access to the device’s photo gallery. The legal basis of the processing is the user’s consent	Required data: <ul style="list-style-type: none">· Identification and contact data provided by the user (e.g., nickname, date of birth to verify that the user meets the minimum age requirement for registration);· Authentication data received from Google and/or Apple via the social login process (email address and/or another unique identifier, name and surname);

	<ul style="list-style-type: none"> · progress monitoring; · upload of track sessions' videos to the dedicated repository for personal use only and/or for overlaying technical information related to the session. 	(Article 6, par. 1, lett. a of the GDPR).	<ul style="list-style-type: none"> · Technical data and network identifiers (e.g., IP address) processed exclusively at the infrastructure level for the functioning of network services and IT systems, without such data being used, recorded, or accessed by TrackTribe application systems; · Identification data relating to the motorcycle used during track sessions and its technical configuration (e.g., brand, model, engine displacement, year, etc.); · GPS location collected by the TrackTribe Device Kit to detect the user's presence on an authorized circuit and enable the activation of the product's features, in order to allow the user to enjoy the TrackTribe experience, map the track session, and generate the track session report; · Identification number of the TrackTribe Device Kit used. <p>Some data may be processed only in the event of optional and voluntary activation:</p> <ul style="list-style-type: none"> · Profile picture if uploaded by the user; · Videos of track sessions if uploaded by the user.
2	Allow the user to find the nearest authorized resellers and installers	The legal basis of the processing is the consent (Article 6, par. 1, lett. a of the GDPR).	<ul style="list-style-type: none"> · GPS location collected by the device (previous authorisation) to allow the user to find the nearest authorised Brembo resellers and installers.
3	Enable users to compare their performance with other riders by posting their driving performance, and any videos they want to share with the TrackTribe community and/or on their social media accounts. Only the user can choose whether to share their results and/or videos with the community, and , if they wish, on their social media accounts.	The legal basis of the processing is the performance of a contract (Article 6, par. 1, lett. b of the GDPR).	<ul style="list-style-type: none"> · Identification data of the account, which will be visible to the entire community: nickname, profile photo (if uploaded); · Telemetry data related to the track driving experience and videos of driving sessions that the user may choose to share.
4	To ensure the quality of our service by analysing, preventing, and correcting errors and malfunctions, as well as processing and responding to any support requests or inquiries the user may send us.	The legal basis of the processing is the performance of a contract (Article 6, par. 1, lett. b of the GDPR).	<ul style="list-style-type: none"> · Identification and contact data (e.g., name and surname, email address, nickname, Brembo TrackTribe ID); · Technical data and network identifiers (e.g., IP address) processed exclusively at the infrastructure level for network and IT system functioning, without being used, recorded, or accessed by TrackTribe application systems;

			<ul style="list-style-type: none"> · Identification data of the motorcycle used during track sessions and its technical configuration (e.g., brand, model, engine capacity (cc), year, etc.); · Geolocation data collected through the App (as described above); · Identification number of the TrackTribe Device used. · Any additional information necessary to process your request for information or assistance.
5	Send newsletters and promotional and commercial communications about Brembo products, as well as market research, surveys or customer satisfaction investigations related to Brembo products.	The legal basis of the processing is the consent (Article 6, par. 1, lett. a of the GDPR).	<ul style="list-style-type: none"> · Identification and contact data (e.g., name and surname, email address); · Identification data of the motorcycle used during track sessions and its technical configuration (e.g., brand, model, engine displacement, year, etc.); · Age range.
6	Improve our products and services, research and development (e.g., by conducting aggregate analyses of data related to vehicle and brake performance, conducting market research on users and research activities, statistical analyses, evaluating and improving the service provided and the performances of the App). To this end, any form of processing of identification data is excluded.	The legal basis of the processing is the consent (Article 6, par. 1, lett. a of the GDPR).	<ul style="list-style-type: none"> · Technical information collected or generated within the App, as well as videos of track driving sessions uploaded to the App, without association to users' identification data and previous pseudonymisation.
7	Compliance with legal obligations.	When such processing is required by a specific legal obligation, the user's personal data may be processed to the extent necessary to comply with that legal obligation (Article 6, par. 1, lett. c of the GDPR).	Any information that may be requested by law or at the direction of a public authority.
8	Establish, exercise, or defend the rights of Brembo or third parties, and carry out business	The legal basis of the processing is Brembo's legitimate interest in establishing, exercising, or	Any information necessary to ensure the achievement of these purposes, without prejudice to the principle of data minimization with regard to

transactions or operations (for example, in the event of a merger, acquisition, reorganization, sale of assets or divestitures, and due diligence related to such transactions).	defending its rights and in conducting business operations or transactions (Article 6, par. 1, lett. f of the GDPR).	processing activities related to the conduct of business operations.
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Authentication via social log-in

For the purposes of authentication via Google or Apple account (social log-in), it should be noted that Google and Apple act as independent data controllers; therefore, users are invited to view their respective privacy policies, available at the following links, before logging in: [[Google privacy notice](#)] [[Apple privacy notice](#)].

4. Processing methods and personnel authorised to process the data

Personal data will be processed by the Company and its authorized personnel belonging to the departments directly involved in the management of the App, in accordance with the principle of strict necessity, and will not be accessible or otherwise usable, even indirectly, by other company departments, with the exception of contact data, which will be processed by the Company's marketing department for the purposes set forth in point 5 above. It should be noted that, where relevant to the pursuit of the purposes set out in point 7 and 8, personnel from the legal and compliance departments and other company personnel who require such access may process the data within the limits necessary to achieve the relevant purposes. The data will be processed using software and systems dedicated to the functions indicated above in accordance with the principles of fairness, good faith and transparency established by applicable laws on data protection, while safeguarding the confidentiality of the Data Subject.

The Company implements technical, IT and organizational measures to ensure an adequate level of security and a processing method in line with the principle of data minimization.

Please note that the geolocation via TrackTribe Device Kit, which is necessary for the functioning of the App, is activated only when the user opens the App. The Device Kit temporally uses the user's location for the sole purpose of verifying whether the user is within the selected track and whether that track is among the authorized tracks. The recording and storage of geolocation and performance data occur only if both conditions are met, that is when the user is actually on the selected authorized circuit. In all other cases (for example, when the user is on a circuit other than the selected one or outside the authorized circuits), the Device Kit does not record or store geolocation or performance data.

5. Communication, data transfer and dissemination

The Company also uses third parties for the provision of management and hosting services for the App. These third parties act as data processors according to the GDPR, on the basis of specific and adequate instructions regarding processing methods and security measures set forth in the relevant contractual documentation. Further information on this matter can be obtained using the contact details provided in Section 7, "Exercise of rights".

Personal data may be shared, at the user's request, with an authorized reseller or installer, in order to enable the latter to provide the user with support regarding installation and/or assistance activities, also in the event of reported anomalies and/or issues. The reseller or installer acts as an independent data controller. It should be noted that the reseller or installer will process only the personal data strictly necessary to address the support request.

In the event that the Company is involved in a transaction or corporate operation (including but not limited to a merger, acquisition, reorganization, sale of assets or divestitures, as well as due diligence related to such transactions) and if necessary for the purposes of preliminary assessments or to complete the transaction, personal data may be disclosed to the Company's advisors and to the advisors of any potential acquirers and may be among the assets transferred to another party.

Furthermore, in the event of a specific request from public, judicial, or police authorities, within the limits established by applicable law and, where available, the data may be disclosed to such authorities. In the event of disputes or where necessary for the defence and protection of its rights, the data will also be disclosed to external lawyers and consultants assisting the Company in handling the matter.

The data will not be transferred outside the European Economic Area and will not be disclosed to third parties.

6. Storage of data

The data will be stored for the time that is necessary to fulfill the above mentioned purposes. In particular:

- Account-related data and data shared within the community will be stored until the user decides to delete their account;
- Data collected to process and respond to support requests and information requests that may be received will be stored for up to 3 years, in order to ensure ongoing support and the prompt and efficient handling of any subsequent requests or issues that may be dependent on or related to previous requests;
- Personal data processed for the purpose of establishing, exercising or defending own rights will be stored for up to ten years, starting either from the date the right arises or the date the relationship comes to an end.
- Personal data processed for the purpose of carrying out business operations or transactions will be stored for the time strictly necessary to achieve the purpose of the processing and to complete the related operations;
- Data collected by Brembo for the purpose of analysing and improving products and services and for research and development purposes (point 6 of the purposes of the processing) will be immediately pseudonymized in order to prevent any connection to the user and will be stored in a separate archive;
- The device's IP address will be immediately deleted after each connection to the network.

7. Exercise of rights

Regarding the data processing described herein, the Data Subject may exercise the rights provided by Articles 15-21 of the GDPR, such as:

- obtain confirmation of the existence of their personal data and gain access to them (**right of access**);
- obtain the updating, modification and/or rectification of their personal data, where applicable (**right of rectification**);
- obtain erasure or restriction of processing of data deemed to have been processed in breach of the law, including data whose retention is no longer necessary in relation to the purposes for which the data were collected or otherwise processed (**right to be forgotten and right to the restriction of processing**);
- withdraw previously given consent, without prejudice to the lawfulness of processing based on that consent; (**right to withdraw consent**);

- receive in a structured, commonly used, and machine-readable format the data provided in the context of the contract, which are processed for the purposes of performing the contract or on the basis of consent, and to have such data transmitted to another controller (**right to data portability**).
- object to processing in the cases established by the GDPR (**right to object**).

These rights may be limited, for example, if providing a response would involve disclosing third-party data, or if the request concerns the erasure of data that must be retained to comply with legal obligations or for which the Company has an overriding legitimate interest in retaining it.

For the exercise of the rights above and in case of further requests for information regarding the present Notice, Data Subjects can contact the Data Protection Officer (DPO) by sending an email to privacy@brembo.com or a written communication to the legal address of the Company, to the attention of the DPO.

The user may also **delete their account** at any time directly from the App, by accessing the “**Settings**” section and selecting the “**Delete account**” option.

The data subject may lodge a complaint to the competent Supervisory Authority if they believe that the processing we carried out or the way in which we handled their requests to exercise their right, does not comply with the applicable legislation. The data subject may contact the supervisory authority of the country in which they habitually reside, work, or the country in which the alleged violation occurred.

8. Miscellaneous

The present Notice may be modified, supplemented, or updated, in whole or in part, at any time. Brembo undertakes to inform users of any material changes, additions, or updates in accordance with Applicable Privacy Laws, also by notifying users through additional means such as pop-up or push notifications within the App or via email in the event of material changes.