Date of update: 23 October 2026

PRIVACY NOTICE PURSUANT TO ARTICLE 13 OF EU REGULATION 2016/679
For Club members

We take data protection very seriously and therefore wish to inform you about how your data is processed and the rights you may exercise under current data protection legislation, in particular the EU Regulation 2016/679 (hereinafter also referred to as the 'GDPR').

1. Joint data controllers *

First Joint Controller
The Wilde Collection UK
4th Floor Elsley Court, 20–22 Great Titchfield Street, London (UK)
Contact details (email): privacy.milan@thewilde.com

Second Joint Controller
The Wilde S.r.l.
Via Alessandro Manzoni 38, 20121, Milan (MI)
Email contact details: privacy.milan@thewilde.com

Third Joint Controller
Milano Club S.p.A.
Via dell'Annunciata 21, 20121, Milan (MI)
Email contact details: privacy.milan@milanoclub.it

2. Categories of data subject to processing

The categories of 'personal data' (pursuant to Article 4(1) of the GDPR) processed by the Joint Controllers may include, by way of example only and certainly not exhaustively:

- Personal and identification details (such as, for example, first name and surname, date of birth, place of birth, nationality, tax code, VAT number, etc.);
- Contact details (such as, for example, address, email address, telephone number, etc.);
- Data relating to the data subject's image;
- Data relating to the data subject's professional role or occupation;
- Personal data required for invoicing (such as, for example, credit card number, etc.);
- Data relating to the data subject's preferences regarding the services provided by the Joint Controllers (such as, for example, concerts, shows, cultural events, culinary preferences, etc.);
- Data relating to interactions with email communications sent by the Data Controller, including data collected via tracking pixels (such as whether messages have been opened, the date, time and number of times they have been opened);
- Data relating to the recipients' interests and preferences, including those inferred from the analysis of interactions with email communications, used for the segmentation and personalisation of promotional communications.

3. Lawfulness and purposes of processing

The processing of personal data is carried out in accordance with the provisions of the General Data Protection Regulation (GDPR) and any other applicable data protection legislation. Details are provided below:

3.1 Purposes aimed at complying with a legal obligation (pursuant to Article 6(1)(c) of the GDPR)

a. Compliance with obligations laid down by laws, regulations and EU legislation, or by provisions issued by authorities or supervisory and regulatory bodies in relation to, or otherwise connected with, the acquisition, maintenance and possible termination of membership status, as well as the use of the services and experiences offered.

The retention period for personal data, in relation to the purposes set out in this section, is:
For purpose (a): 10 years from the termination of membership.
These periods may be extended in the event of a dispute or as required by law.

3.2 Purposes relating to the performance of a contract or pre-contractual measures (pursuant to Article 6(1)(b) of the GDPR)

a. Management of the process for assessing a potential member's application for membership, including any checks on the data subject's online presence and interviews;
b. Management of administrative, accounting and tax processes relating to the acquisition, maintenance and termination of membership;
c. Fulfilment of contractual obligations and legal transactions, and in particular, the provision of requested services (such as, for example, booking seats or tables for Club events);
d. Protection of contractual rights or rights otherwise arising from the relationships between the parties. It should be noted that, where the protection of rights is not directly linked to the performance of the contract entered into, **the legal basis for** the related processing **is legitimate interest (pursuant to Article 6(1)(f) of the GDPR), which is binding and derives from the contractual relationship established between the parties** .

The retention period for personal data, in relation to the purposes set out in this section, is :
For purpose (a): until the end of the assessment process;
For purposes b) to d): 10 years from the date on which membership ceases;
For purpose c: until the termination of membership.
These periods may be extended in the event of a dispute.

3.3 Purpose : to pursue a legitimate interest (pursuant to Article 6(1)(f) of the GDPR)

a. Communication, via email and notifications from the App, of activities and events organised by the Club in which the data subject may participate as a member;
b. Transfer of data within the business group to which the Joint Controllers belong for internal administrative purposes;

c. Protection of the interests and/or rights of the Joint Controllers and/or other companies within the group in the context of non-contractual liability;
d. Taking a close-up photograph for the purpose of recognising members upon entry to the Clubs;
e. Compilation of aggregated statistics regarding members' demographics and the services and products purchased within the Clubs;
f. Compiling aggregated and anonymous statistics on the performance of the email communication campaigns referred to in purpose 3.3(a) of this notice, including through the use of tracking pixels, in order to measure overall message open rates, assess the general performance of the campaigns and improve the effectiveness and correct delivery of communications, without carrying out any analysis or monitoring that can be traced back to individual recipients.

The retention period for personal data, in relation to the purposes set out in this section, is:
For purpose (a): 12 months from the last acquisition or renewal of membership status, unless the data subject objects. In **this regard, it is specified that any refusal or withdrawal of consent for other marketing purposes, other than the aforementioned purpose (a), does not constitute an objection to that purpose and will not result in the cessation of that purpose and related activities;**
For purpose (b): 10 years from the termination of membership;
For purpose (c): 5 years from the event giving rise to the need for protection;
For purpose d: until the end of membership;
For purpose (e)(f): the data is aggregated and therefore anonymised at the time of collection.
These timeframes may be extended in the event of a legal dispute.

3.4 -related purposes covered by the data subject's consent (pursuant to Article 6(1)(a) of the GDPR)

a. Personalisation of the experience within the Club through the analysis and profiling of the data subject's interests, preferences and tastes, including through the individual monitoring of interactions with email communications via the use of tracking pixels, which enable the collection of information relating to the opening of messages, the date, the time and the number of times a message has been opened, in order to identify the data subject's interests and preferences and to personalise communications, content and offers within the Club, in line with their profile;
b. Disclosure of data to other companies within the group to which the Joint Controllers belong, operating in the hospitality and entertainment sector, to receive communications, via email and notifications from the App, regarding the activities and events organised by the respective Clubs in which the data subject may participate as a member;
c. Inclusion, at the data subject's own initiative, in communication channels via telephone number on instant messaging platforms (such as WhatsApp, Telegram, etc.) to receive real-time updates on upcoming events and, more generally, to be informed of new offers made available to Club members.

The retention period for personal data, in relation to the purposes set out in this section, is:
For purposes a and b: up to 12 months from the date of termination of membership, or until consent is withdrawn;
For purpose c: until consent is withdrawn by requesting deletion or leaving the relevant messaging channel.

4. Recipients or categories of recipients of personal data (pursuant to Article 13(1)(e) of the GDPR) *

In connection with the aforementioned purposes, the Joint Controllers may disclose your data to:

- Offices and internal departments of the Joint Controllers;
- Accountancy consultants and chartered accountants;
- Companies and professional service providers offering IT services, including electronic data processing, software and cloud management, website management and IT consultancy, hosting and email service providers;
- Regulatory and supervisory bodies;
- Law firms, professionals and compliance advisers;
- Companies, agencies and professionals in the fields of communications and advertising;
- Other companies forming part of the business group to which the Joint Controllers belong, operating in the catering and entertainment sectors;
- Public administrations, competent authorities, public bodies and agencies in the course of carrying out their institutional duties.

** Further information on the recipients (pursuant to Article 4(9) of the GDPR) is available from the joint controllers of the personal data at the contact details set out above.*

5. Recipients or categories of recipients of personal data (pursuant to Article 13(1)(f) of the GDPR) * and transfer of data to countries outside the EU

The Joint Controllers hereby inform you that they intend to transfer the data subject's data to countries outside the EU and the EEA. These countries may not be recognised by the **European Commission**** as countries that ensure an adequate level of protection for personal data. Therefore, when we transfer your personal data outside the EU, we will implement appropriate safeguards in accordance with the obligations under current EU and Italian legislation, in order to ensure that your data is adequately protected.

In particular, your data may be disclosed to the United Kingdom, in **accordance with Article 45 of the GDPR,** as a third country deemed adequate by the European Commission under Implementing Decision (EU) 2021/1773**,** to companies belonging to the business group of which the Joint Controllers form part, and to companies and professional service providers that supply IT services, for the purposes set out above in point 3.1(a), 3.2(a), (b), (c) and (d), point 3.3(a), (b), (c) and (d), and finally point 3.4(a) and (b).

With regard to the personal data subject to the aforementioned transfers to territories outside the EU, the data subject may obtain information by submitting a request to the Joint Controllers by sending an email to the following address:privacy.milan@thewilde.com .

** Further information on the Recipients (pursuant to Article 4(9) of the GDPR) is available from the Joint Controllers at the contact details provided above.*

*** The updated list of non-EEA countries deemed to have an adequate level of protection by the European Commission can be found on the website: https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en*

6. Rights of the Data Subject (pursuant to Article 13(2)(b) of the GDPR)

The data subject may exercise the following rights:

- the right of access [Article 15 of the EU Regulation] (the right to be informed about the processing carried out on their Personal Data and, where applicable, to receive a copy thereof);

- the right to rectification of their Personal Data [Article 16 of the EU Regulation] (the data subject has the right to have inaccurate Personal Data concerning them rectified);
- the right to erasure of one's Personal Data without undue delay ('right to be forgotten') [Article 17 of the EU Regulation] (the data subject has, and will continue to have, the right to have their data erased);
- the right to restrict the processing of their Personal Data in the cases provided for in Article 18 of the EU Regulation, including in the event of unlawful processing or where the data subject contests the accuracy of the Personal Data [Article 18 of the EU Regulation];
- the right to data portability [Article 20 of the EU Regulation], whereby the data subject may request their Personal Data in a structured format in order to transmit it to another data controller, in the cases provided for in that Article;
- the right to object to the processing of their Personal Data [Article 21 of the EU Regulation] (the data subject has, and will continue to have, the right to object to the processing of their personal data);
- the right not to be subject to automated decision-making [Article 22 of the EU Regulation] (the data subject has, and will continue to have, the right not to be subject to a decision based solely on automated processing).

Further information regarding the data subject's rights may be obtained by requesting a full extract of the articles referred to above from the Joint Controllers.
With regard to the purposes for which consent has been requested, the data subject may withdraw their consent at any time, and the withdrawal shall take effect from the moment it is made, subject to the time limits laid down by law. In general terms, the withdrawal of consent applies only to the future.
, the aforementioned rights may be exercised in accordance with the provisions of the Regulation, including by sending an email to the following address: privacy.milan@thewilde.com.
In accordance with Article 19 of the EU Regulation, the Joint Controllers shall inform the recipients to whom the personal data have been disclosed of any rectifications, erasures or restrictions on processing requested, where this is possible.
To ensure a more prompt response to your requests made in the exercise of the aforementioned rights, these may be addressed to the Joint Controllers using the contact details set out in point 1.

7. Right to lodge a complaint (pursuant to Article 13(2)(d) of the GDPR)

If the data subject considers that their rights have been infringed, they have the right to lodge a complaint with the Data Protection Authority, in accordance with the procedures set out by that Authority at the following web address: http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524 or by sending a written communication to the Data Protection Authority.

8. Possible consequences of failure to provide data and the nature of the provision of data (pursuant to Article 13(2)(e) of the GDPR)

8.1 In the case of compliance with legal or contractual obligations

Please note that, where the legal basis for the processing purposes is a legal or contractual (or even pre-contractual) obligation, the data subject must provide the requested data.
Otherwise, the Joint Controllers will be unable to carry out the specific processing purposes.

8.2 Where processing is based on a legitimate interest

Similarly, with regard to purposes based on a legitimate interest and which do not require consent, the data subject's objection means or will mean that it will be impossible to carry out the respective purposes and any related services to which the data subject has objected, subject to any overriding legitimate grounds on the part of the Joint Controllers or those aimed at safeguarding rights in legal proceedings.

8.3 In the event of the data subject's consent

For other purposes for which consent is required, the data subject may withdraw their consent at any time, and the withdrawal shall take effect from the moment it is made, subject to the time limits laid down by law. Generally speaking, the withdrawal of consent applies only prospectively. Therefore, any processing carried out prior to the withdrawal of consent shall remain unaffected and retain its lawfulness.
Failure to give consent**, or** giving only partial consent **(or the withdrawal of consent)** may mean that services or activities cannot be provided in full, in relation to the specific purposes for which consent is withheld, **and shall not prejudice or impede other purposes (and related activities) not expressly affected by the withdrawal of consent or not based on that legal basis.**

When data is no longer required, it is regularly deleted; if deletion is impossible or would involve a disproportionate effort due to a particular method of storage, the data may not be processed and must be archived in areas that are inaccessible.

9. Existence of automated decision-making (including profiling)

The use of purely automated decision-making processes, as detailed in Article 22 of the GDPR, is currently excluded. Should a decision be taken in future to implement such processes for individual cases, the data subject will be notified separately where required by law or via an update to this privacy notice.

10. Methods of processing

Personal data will be processed in paper, computerised and electronic form and entered into the relevant databases, to which the following may have access and thus become aware of the data: staff expressly designated by the Joint Controllers as Data Processors and Authorised Persons for the processing of personal data, who may carry out operations involving consultation, use, processing, comparison and any other appropriate operation, including automated ones, in compliance with the legal provisions necessary to ensure, amongst other things, the confidentiality and security of the data, as well as the accuracy, up-to-date nature and relevance of the data in relation to the stated purposes.

CONSENT PURSUANT TO ARTICLE 7 OF EU REGULATION 2016/679

The undersigned _____ declares that they have fully understood the privacy notice provided by The Wilde Collection Ltd., The Wilde S.r.l. and Milano Club S.p.A. as joint data controllers and, in accordance with the provisions of Article 7 of the EU Regulation:

with regard to section 3.4(a): "Personalisation of the experience within the Club through the analysis and profiling of the data subject's interests, preferences and tastes, including through the individual monitoring of interactions with email communications via the use of tracking pixels, which enable the collection of information relating to the opening of messages, the

date, the time and the number of times messages are opened, in order to identify the data subject's interests and preferences and to personalise communications, content and offers within the Club, in line with the data subject's profile".

Consents to processing for the purposes set out above ☐ **You do not consent to the processing for the purposes set out above ☐**

in relation to section 3.4(b): "Disclosure of data to other companies within the group to which the Joint Controllers belong, operating in the hospitality and entertainment sector, in order to receive communications, via email, regarding the activities and events organised by the respective Clubs in which the data subject may participate as a member".

Consents to processing for the purposes set out above ☐ **You do not consent to the processing for the purposes set out above ☐**

_____
(Place and date)

_____
(signature of the data subject)