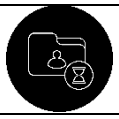
PRIVACY POLICY INFORMATION
Information document pursuant to and for the purposes of Article 13 of Regulation (EU) 2016/679 (EU GDPR) and the UK GDPR (having the meaning given in in section 3(10) (as supplemented by section 205(4)) of the UK Data Protection Act 2018). References in this Privacy Policy to the GDPR are to the EU GDPR or the UK GDPR as applicable.
Update date: 29 October 2026

	**DATA CONTROLLER** MDC S.p.A., with registered office at Viale Lombardia 17, 20131 Milan, Tax Identification Code and VAT No. 12584550151, the ("**Controller**"), email privacy@massimodecarlo.com certified email mdc-srl@legalmail.it owner of the trademark MASSIMODECARLO
	**DATA PROTECTION OFFICER** The Data Controller has appointed a Data Protection Officer ("DPO"), Veronica Devetag Chalaupka, who can be contacted at the following address: dpo@massimodecarlo.com or PEC: veronica.devetagchalaupka@milano.pecavvocati.it
	**RECIPIENTS OF THE PRIVACY POLICY INFORMATION DOCUMENT** This privacy policy information document applies to visitors to MASSIMODECARLO and to users of the website https://www.massimodecarlo.com/ (the "**Website**"), and its suppliers.
	**SOURCE OF DATA COLLECTION** Your personal data identified below (the "**Personal Data**" or "**Data**") may be collected directly when you visit one of our galleries located in Italy, France, the United Kingdom, Hong Kong, China, and the United States (the "**Galleries**"), during exhibitions, trade fairs, and/or our events, when you browse on our Website or purchase, for your own or on behalf of the company you represent, one of our works (the "**Works**") or catalogues of Works, either at our Galleries or through the Website.

Purpose of processing			
	1. Purchase of Works and Catalogues Allow the purchase, in person or remotely, also on behalf of a company, of Works or catalogues of Works at one of our Galleries, at trade fairs or at the Website and provision of after-sale services.		***Type of Data*** Personal and contact details, such as name, surname, tax identification code, email, telephone number, shipping address, ID information, and possibly role in the company you represent. Purchase data such as means of payment, type and price of Works or catalogues of Works purchased.
			***Legal Basis*** The need to fulfil pre-contractual and contractual obligations to which you, or the company you represent, are a party.
			***Nature of Provision*** Required. If you do not wish to provide your Data, the Data Controller will not be able to execute the corresponding purchase order or provide the services for the Works or catalogues of Works.
			***Data Retention Period*** The Data Controller undertakes to delete Data provided for the execution of the sale and management of after-sale services from its systems 10 years after the date of the last purchase or the last interaction with the Data Controller.
	*2. Anti-money laundering* *Carrying out anti-money laundering checks necessary for the sale of the Works.*		***Type of Data*** Personal and contact details, such as name, surname, tax identification code, identity document data and possibly role in the company you represent.
			***Legal Basis*** The need to comply with legal obligations.
			***Nature of Provision*** Required. If you do not wish to provide your Data, the Data Controller will not be able to execute the corresponding purchase order for the Works.
			Data Retention Period

			The Data Controller undertakes to delete your Data provided for anti-money laundering verification purposes from its systems 10 years after the date of the last purchase.
	*3. Contact Request* *Management of contact requests made through the appropriate form on the Website ("contacts") or by email to the Data Controller.*		***Type of Data*** Personal data and contact details, such as name, surname, email address, telephone number as well as personal data communicated in the appropriate form available on the Website or to the Data Controller's email box.
			***Legal Basis*** The need to fulfil pre-contractual and contractual obligations to which you are a party, as well as that to fulfil legal obligations.
			***Nature of Provision*** Required. In the absence of provision of the data, it will not be possible for the Data Controller to process requests sent.
			***Data Retention Period*** The Data Controller undertakes to delete Data provided in relation to requests made through the Website or by email from its systems 1 year after the date of provision.
	4. Customer registration To allow customer registration and access to related services (such as participation in one of our exhibitions, trade fairs or events, or access to our VSpace virtual gallery). You may register on our Website, at one of our Galleries or during one of our exhibitions, trade fairs or events.		***Type of Data*** Customer and contact details such as name, surname, e-mail address, address telephone number, type of customer (private customer or art advisor) and possibly role in the company you represent.
			***Legal Basis*** The need to fulfil pre-contractual and contractual obligations to which you are a party, as well as that to fulfil legal obligations.
			***Nature of Provision*** Required. If you do not wish to provide your Data, you will not be able to register as a customer or use related services
			***Data Retention Period*** The Data Controller undertakes to delete Data provided for your registration from its systems 10 years after the date of cancellation of the relevant registration.
	5. Newsletter/Marketing To communicate, also through our newsletter, business-related information about exhibitions, trade fairs, shows and events for the sale or presentation of Works, or to request participation in any customer satisfaction surveys and market research. These communications will be sent by email or telephone, including by automated means (SMS, social network messaging systems).		***Type of Data*** Personal and contact details such as name, surname, email address, address, phone number, date of birth and possibly role in the company you represent.
			***Legal Basis*** Your explicit consent to the processing of Data for this purpose. If you have given consent, you may withdraw it at any time by clicking on the unsubscribe button contained in the emails or newsletters received or by email sent to the Data Controller. You may also, in any case, prefer to be contacted by traditional means only, by selecting the preferred method or, subsequently, by stating your opposition solely to the receipt of communications by automated means, by email sent to the Data Controller. .
			***Nature of Provision*** Optional. If you do not wish to provide your Data, it will not be possible for the Data Controller to keep you constantly updated on initiatives reserved to customers, or to use the Data for market research and statistical and customer satisfaction analysis**.**
			***Data Retention Period*** The Data Controller has provided for deletion of the Data processed to send you commercial information, including customized information, following categorization or profiling based on the parameters described below, on shows, exhibitions, trade fairs and events, as well as for participation in customer satisfaction surveys and market research, 10 years after the collection

			of the Data, or until you object. To this end, the Controller has taken into account the type of Works offered, assuming an average frequency of purchase by customers of one or a maximum of two Works every 6-7 years. Therefore, shorter data analysis times would not allow the provision of customized services. In any event, the Data will be retained for 10 years for sales management and after-sale services.
	6. Categorization Categorization of customers based on a number of parameters, for the purposes of sending promotional communications tailored to the requirements of a certain category or group of which you are a member (private customer or art advisor, particular purchase channels or catalogues of Works, residents of a specific region, etc.).		***Type of Data*** Personal and contact details, such as name, surname, e-mail address, telephone number, country of residence, customer type (private customer or art advisor who operates individually or on behalf of a company), particular purchase channels or catalogues of Works).
			***Legal Basis*** The lawful interest of the Data Controller in optimizing the efficiency of its marketing activities, balanced against Customers' interest in receiving only communications of interest to them regarding the category to which they belong (private customer or art advisor, whether they have made online purchases or from one of our Galleries, if they are resident in a particular region). We will only send promotional communications according to your group or category if you have given your consent, which may be withdrawn at any time and without prejudice. You may at any time exercise your right to object to the receipt of these communications, immediately or subsequently, by clicking on the unsubscribe button contained in the emails or newsletters received or by writing to the Data Controller by email.
			***Nature of Provision*** Optional. If you wish to object to the processing of your Data, it will not be possible for the Data Controller to keep you constantly updated on offers intended for certain categories of customer. If you have given your consent to receive any promotional information you will receive only general newsletters
			***Data Retention Period*** As in point 5.
	7. Profiling Customer profiling assesses your preferences, interests, characteristics, and purchasing habits with regard to our Works on a number of metrics, for the purposes of customizing promotional communications or for a customized shopping experience at our Galleries or Website.		***Type of Data*** Personal and contact information, such as name, surname, date of birth, age range, e-mail address, phone number, country of residence, profession, type of customer (private customer or art advisor who operates individually or on behalf of a company), frequency and channels used to purchase Works or catalogues of Works, value and number of Works purchased in a given time-frame, participation in exhibitions, trade fairs, events of interest, Works or catalogues of Works viewed, interest in certain artists, catalogues requested, interests and data regarding conduct on our Website.
			***Legal Basis*** Your explicit consent to the processing of Data for this purpose. If given, customers may withdraw consent at any time in writing by email to the Data Controller.
			***Nature of Provision*** Optional. If you do not wish to provide your Data, it will not be possible for the Controller to keep you constantly updated on targeted offers relevant to your preferences, interests, characteristics and shopping habits or to offer you a customized shopping experience at our Galleries. If you have given your consent to receive any promotional information you will receive only general newsletters.
			***Data Retention Period*** As in point 5.
	8. Supplier Registration. Contact Management.		***Type of Data*** Personal and contact information, such as company name and/or first name, last name, e-mail, address, phone number, as well as tax and banking information.
			***Legal Basis*** The need to execute pre-contractual and contractual obligations to which you are a party, as well as the need to fulfill legal obligations.
			***Nature of Provision*** Contractual and legal obligation.

			***Data Retention Period*** The Data Controller undertakes to delete Data provided for your registration from its systems 10 years after the after the contractual term.
	**9. Use of tracking pixels in email communications**		***Type of Data*** Emails sent by the Controller may contain tracking pixels, which are tiny, invisible images. They are hosted on the servers of the email delivery platform, which acts as a data processor. A pixel is only activated if your email program downloads images automatically. When an email is opened, the pixel records that it has been opened, the date and time, the number of times it has been opened, the IP address and the type of device or email client used. It does not give access to the content of the email. The Data is used to: a) measure overall open rates and improve email delivery, in aggregated and anonymous form; b) ensure security (such as account activation or password resets) and send service communications the Controller is required to send; c) assess your interest in the promotional communications you receive and tailor their content and frequency, on an individual basis and, where applicable, for the profiling purposes described in point 7.
			***Legal Basis*** For purpose a), the Controller's legitimate interest. For purpose b), the fulfilment of contractual and legal obligations. For purpose c), your explicit consent, given when you sign up for promotional communications.
			***Nature of Provision*** For purpose c), provision is optional. You can withdraw your consent at any time, with no effect on the service you receive, by using the link at the bottom of every email. You can choose either to stop receiving our emails altogether or to keep receiving them without tracking pixels. You can also turn off automatic image downloads in your email program.
			***Data Retention Period*** The Data is kept for as long as necessary for the purpose pursued and, for purpose c), as in point 5.

	**COOKIES** The website uses information technology for the direct acquisition of personal user identification data consisting of “code strings”: “cookies”. For all information about cookies active on the Website and the related processing of personal data, please see the relevant policy statement in the "Cookie policy" section of our Website. The information contained in this policy does not apply to third-party websites, apps or content of any kind, even if accessible from the Website by clicking on links contained therein. In such cases, the data protection provisions of such third parties may apply, which may differ from those presented herein and which the data subject is invited to consult prior to the communication of any Data.
	**METHODS OF DATA PROCESSING** The Data will be processed in compliance with the principles of fairness, lawfulness and transparency, through manual and automated methods and using paper and electronic means, in any case within the limits of the purposes of the data processing(s) established by this privacy policy information sheet and, in any case, always guaranteeing the security and confidentiality of the Data. In addition, and without prejudice to the above, the Controller undertakes to base the processing of Personal Data on the principles of minimization, verifying on an annual basis the need for their storage for a period not exceeding that required by the purposes for which the data were collected and processed. The Controller may retain Personal Data in order to comply with the law or to exercise or defend any right or claim in judicial proceedings. Once the purposes for which the Personal Data have been collected and processed have been achieved, the Data Controller shall implement appropriate measures to make them anonymous, so that the data subject cannot be identified. .
	**POSSIBLE AUTOMATED DECISION-MAKING PROCESSES** As indicated above, the Data Controller shall, on the basis of its lawful interest, categorize its customers in order to send commercial information on shows, exhibitions, trade fairs and events targeted at the needs of a certain category or group of customers to which you belong. This procedure is carried out by dividing the interested parties into non-invasive and non-discriminatory categories, such as country of residence (residents in Italy, for example, if it involves identifying a category of parties who may be interested in an event in Milan), type of customer (private customer or art advisor who operates individually or on behalf of a company) and purchase channels used for the Works or catalogues of Works (e.g. differentiating communications addressed to customers who mainly use the Website from those preferring purchases at the Galleries and trade fairs). Following this analysis, which may also be automated, the user can be classified into one or more groups with different characteristics and receive from the Data Controller, communications dedicated to the category that the Data Controller considers are in line with the customer’s requirements. In relation to such processing, the Data Controller has successfully conducted a fair balance test in order to determine that the processing linked to the categorization in question is conducted on the legal basis of the lawful interest of the Data Controller in achieving maximum efficiency in its marketing activities. The Controller may also, with your consent, analyse your purchasing habits over time, for a more in-depth assessment than one based on a simple categorization, of which Works or initiatives best meet your tastes and preferences (for example, if during a 2-year period you demonstrate an interest in a particular Work or artist, we will send you proposals dedicated to that type of Work or artist and not others that are not of interest to you or that are outside your sphere of tastes and preferences). In this way we can offer you a unique and customized shopping experience even if you visit one of our Galleries. In that case, our sales team will be able to recognize you and direct you more efficiently to the Work or to the artist that you prefer. Of course you can always ask our team to evaluate different proposals. It should be noted that the Data Controller has conducted a specific impact assessment of the processing of personal data necessary for profiling to ensure compliance with the principles of the GDPR, including non-discrimination, efficacy and the absence of harmful consequences for the Data Subject.



DATA RECIPIENTS/CATEGORIES OF RECIPIENTS

Data may be collected and processed by our staff expressly authorized to process the Data on the basis of instructions and subject to the adoption of appropriate measures to protect the Data in relation to all the purposes indicated above, and by the staff of our related and/or subsidiary companies listed below who manage the Galleries abroad (the "MDC Companies"). Carlson Ltd. 16 Clifford Street W1S 3RG London United Kingdom; Carlson East Ltd. Rooms 501-2, 5/F, Wilson House, 19-27 Wyndham Street, Central Hong Kong; Carlson Atlantic Inc. c/o Diacron USA LLC Suite 1904, 50 Broad Street New York, NY 10004 USA; MDC Shanghai Co. Ltd Room I-06, Floor 22, No.2500, Siping Road, Yangpu District, 200433 Shanghai, China; Decharles Sàrl 57 Rue de Turenne, 75003 Paris, France.
MDC companies will be designated by us as data processors for the collection of data for marketing and profiling purposes. With reference solely to the management of sales activities for the Works and after-sales at MDC Companies, the latter shall collect and process the Data as autonomous data controllers, as indicated in this privacy policy information sheet, as applicable.
The following entities may become aware of the Data in relation to the processing purposes provided for in this privacy policy notice and may process the Data both as autonomous data controllers and data processors duly appointed by the Data Controller (a list of such data processors and autonomous data controllers is available upon request via email to be forwarded to privacy@massimodecarlo.com):

- Companies that provide and perform additional services related to the purposes of processing, banking operators, electronic payment carriers, credit card issuers, internet providers, couriers and freight forwarders, companies that organise events or send newsletters or conduct market research, companies that provide data analytics services, companies that provide IT infrastructure and IT support and advisory services, law firms or accountants, auditors; these parties will act as data processors or in certain cases as autonomous controllers;
- Buyers or successors of the Data Controller in the event of a merger, assignment, restructuring, reorganization, dissolution or other sale or transfer of some or all of the assets of the Data Controller, where the Data is transferred; these persons will act as autonomous controllers and we will only share with them the Data necessary for the evaluation of the transaction on the basis of our lawful interest.



TRANSFER OF PERSONAL DATA ABROAD

Your Data will be processed and stored in our management and customer relations database, whose servers are located respectively in the
European Union and the United States. With particular reference to processing of Data outside the EEA and the UK, we inform you that: (i) staff of managers and/or salespersons at the Galleries abroad may also access the Data when the Data Subject visits the Gallery; (ii) the database for managing customer relations is stored on the servers of Amazon Web Services, Inc. in the United States which is managed by our provider, the data processor, ARTLOCAL INC., with registered office at 18 Finsbury Drive Brampton, Ontario L6T 3P9. In all such cases, the Data Controller undertakes to:

- Ensure that the country to which the Data is sent guarantees an adequate level of protection as provided for in Article 45 GDPR; or
- To use the Standard Data Protection Contractual Clauses or International Data Transfer Agreement (or IDTA Addendum) approved by the European Commission or the UK Government for the transfer of personal information outside the EEA or the UK pursuant to Article 46.2 GDPR.

For more information on the persons and countries involved, please send a request to the following email address: privacy@massimodecarlo.com



RIGHTS OF DATA SUBJECTS

The data subject may at any time exercise the following rights under the conditions and within the limits established in Articles 12-22 of
the GDPR by sending an email to privacy@massimodecarlo.com

- Right of access (Article 15 GDPR);
- Right to rectification of inaccurate personal data and to have incomplete personal data completed (Article 16 GDPR);
- Right to erasure of personal data (Article 17 GDPR);
- Right to restrict processing (Article 18 GDPR);
- Right to object to processing pursuant to Article 6(1)(e) or (f) of the GDPR including profiling (Article 21 GDPR);

If you believe that the processing of personal data by the Data Controller is in breach of the provisions of Regulation (EU) 2016/679, you
have the right to lodge a complaint with the Supervisory Authority, in particular in the Member State in which you normally reside or
work or in the place where the alleged breach of the regulation occurred (in Italy, the Italian Data Protection Authority https://www.garanteprivacy.it/), or to take legal action.
In the event that the processing is based on your consent or a contract and is carried out by automated means, you have the right to
receive your personal data in a structured, commonly used and machine-readable format and, if technically feasible, to transmit such data
to another data controller without impediment under Article 20 of the GDPR.

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