

## EXTERNAL SOCIAL MEDIA POLICY

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#### 1. Premise

Sammontana S.p.A. Società Benefit (hereinafter "**Sammontana**" or the "**Company**"), with registered office at via Tosco Romagnola n. 56, 50053 Empoli (FI), telephone number: 0571 7076, Fax: 0571 707447, E-mail: [sammontana@sammontana.it](mailto:sammontana@sammontana.it), certified mail: [sammontana@legalmail.it](mailto:sammontana@legalmail.it), is present on the most important digital platforms to engage with its users (hereinafter the "**Users**") and disseminate information on its services, initiatives and activities.

This Social Media Policy (hereinafter also referred to as the "**Policy**") defines and regulates the purposes, types of content and behaviour that are allowed on the corporate pages and/or social profiles created by the Company, in order to guarantee a proper procedure for the use of digital platforms on the part of the Users.

#### 2. Social Networks and Content publication

Social networks are online information services that allow text and/or multimedia content to be shared among individuals who adhere to a community by creating personal profiles (hereinafter the "**Social Networks**").

In order to inform Users on activities and initiatives promoted as well as to stimulate dialogue with Users, the Company publishes content in the form of text, photographic images, videos and other multimedia material which is self-produced or whose rights have been acquired from the author (hereinafter also referred to as the "**Content**"), through the platforms of the following Social Networks:

[Facebook];

[Instagram];

[LinkedIn];

[Youtube];

[Twitter];

[Linkedin].

Content published by the Company cannot be freely reused by third parties under any circumstances; it can, however, be shared through the Social Network itself.

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Any advertising space that appears next to Content published on the Social Network's pages is autonomously managed by the Social Networks themselves and is, therefore, outside of the Company's control.

It is recommended to read the general terms and conditions of use of the relevant Social Networks before accessing and using them.

### 3. Conditions of use

Any user may participate in the activities of the Company's corporate pages and/or social profiles by expressing his/her personal opinions with comments and messages. Such comments constitute the opinion of the individual users and not of the Company, which declines all responsibility with regard to the truthfulness and correctness of content posted by Users on its corporate pages and/or social profiles.

The Company reserves the right to delete any comments, messages, posts which:

- are discriminatory and offensive to individuals, groups or categories of people in terms of gender, race, language, ethnicity, religion, political views, personal and social circumstances, sexual orientation and age;
- contain images of minors posted without the prior permission of their parents or guardians;
- are discriminatory and offensive to other users, whether or not engaged in the discussion, institutions, associations, organizations in general, firms and the Company, or in any other way detrimental to the rights of third parties;
- include language which is inappropriate, vulgar, licentious, offensive to public decency and/or threatening in tone;
- include subject matter which is obscene, pornographic or offensive to public morale and sensibility;
- are deceitful and designed to generate alarm;
- contain personal data regarding third parties and/or which may injure their reputation and/or cause harm;
- contain particular categories of data regarding third parties, in accordance with data protection legislation;
- include subject matter which is unlawful or which instigates unlawful acts and/or violates copyright law;
- contain advertising or promote profit-making activities;
- contain political opinion, propaganda or spam;
- are irrelevant to the discussion taking place, repetitive and intended to disrupt the discussion.

As administrator of the page and/or profile, the Company exercises ex-post content moderation - meaning after a post has been published - and solely for the purposes of verifying compliance with the above-mentioned rules.

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The Company reserves the right to ban and/or block anyone who repeatedly violates these moderation rules and, in the most serious cases, even for one single violation, by reporting the User to the manager of the platform and, if necessary, to law enforcement authorities.

## 4. Influencers, Celebrities & Bloggers

The Company makes use of influencers, celebrities and bloggers for the online promotion of its brands, products or services, because the direct involvement of such individuals can generate loyalty and appreciation in end consumers.

- Influencers or bloggers are individuals who have the ability to influence consumers in their choice of a product or their opinion on a brand due to the prestige and authority gained through their experience and knowledge in a given field.

Celebrities are individuals who belong to the world of entertainment, art, culture or sport or who have gained particular prominence on national media.

In its contractual agreements with influencers, celebrities and bloggers, the Company expressly states that the latter must inform users of the promotional nature of content posted on social media. In particular, such individuals are contractually bound to insert in their posts/videos/stories/ reels and in any other type of content one of the following entries in a clearly visible form:

- Publicity/Advertising;
- promoted by/sponsored by;
- In collaboration with/in partnership with;
- and/or one of the following entries in the first three hashtags:
- #publicity/#advertising;
- #sponsored by;
- #jointly with #brand.

In cases where the relationship between the Company and the influencers, celebrities and bloggers is limited to the occasional sending of free or modest-value products, they are obliged to insert a disclaimer in their posts, as follows: “product sent by + name of the Company”.

In case of promotional live videos / stories/ reels posted on social networks, their commercial purpose must be clearly stated by means of appropriate disclaimers in the first and last frames of the video, or by the influencer, celebrity and blogger featured in the video stating verbally: “this product was sent to me by + name of the Company”.

## 5. Personal Data Protection

The processing of the personal data of Users accessing and utilizing the digital platforms is regulated by the *privacy policies* adopted by each Social Network and published on the relevant platform.

For more information, it is recommended that the User consults the *privacy policy* published on the Social Network's platform before accessing and/or using it.

Personal data published by Users on the pages and/or social profiles of Sammontana shall be processed by the Company subject to the Users' express consent, in accordance with applicable personal data protection legislation.

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Photographic images and/or videos of Users are published only where the Users have been previously informed by an appropriate statement issued at the time of collecting the stated images and have given their explicit consent.

Users are invited to carefully evaluate whether it is advisable to include personal data in their comments and posts (including their e-mail address) that may, even indirectly, reveal their identity or that of third parties (for example individuals connected with the author of the post). Any such posts and personal data are visible and accessible to any User visiting the pages and/or social profiles and can be indexed by and accessed through general-purpose search engines.

Users are advised to consider whether or not to publish photographs or videos that may lead to either identify or make it possible to identify people and places that may be subject to image protection.

August 3th, 2023

**SAMMONTANA S.P.A. Società Benefit**