

Privacy Policy – Sky Lo Milano T37-1

Data Controller

Milano Luxury Realty S.r.l.

Registered office: Via Giuseppe Sapeto, 2 – 20123 Milan (MI), Italy

Operating office: Via Giosuè Carducci, 12 – 20123 Milan (MI), Italy

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VAT / Tax Code: 13586880968

1. Purpose of Data Processing

The personal data collected through the “Sky Lo Milano T37-1” landing page are processed by Milano Luxury Realty S.r.l. exclusively for the following purposes:

- a) to handle requests for information, and to schedule calls or appointments with the sales team;
- b) to send digital or printed informational materials about the project;
- c) to analyze, in an aggregated and anonymous form, the effectiveness of digital campaigns and contact channels;
- d) to comply with legal, fiscal, or administrative obligations.

Data are processed in accordance with the principles of lawfulness, fairness, transparency, relevance, and data minimization as provided by Regulation (EU) 2016/679 (GDPR).

2. Legal Basis and Processing Methods

Data processing is carried out using electronic and telematic tools, including tracking systems (Google Tag Manager, GA4, Meta Pixel, Microsoft Clarity, etc.), for purposes strictly related to the requested services.

The legal bases for processing are:

- execution of pre-contractual measures adopted at the data subject’s request (Art. 6, lett. b, GDPR);
- compliance with legal obligations (Art. 6, lett. c, GDPR);
- explicit consent for promotional communications or remarketing activities (Art. 6, lett. a, GDPR).

Providing personal data is optional, but failure to do so may prevent us from fulfilling user requests.

3. Data Sharing and Recipients

Data may be shared with:

- **Kervis SGR S.p.A.**, developer of the Sky Lo Milano T37-1 project, exclusively for informational and commercial purposes related to the initiative;
- companies responsible for technical management of IT systems and web hosting;
- consultants and collaborators acting on behalf of the Data Controller in commercial, legal, or administrative matters;
- partners of the **Barnes International Realty** network, solely for managing contacts and sales activities related to the project.

Data will not be disclosed or transferred to unauthorized third parties.

4. Data Transfers Outside the EU

Some technical service providers or marketing platforms may operate servers located outside the European Union.

In such cases, Milano Luxury Realty S.r.l. ensures that data transfers comply with the **Standard Contractual Clauses** approved by the European Commission or occur toward countries subject to adequacy decisions pursuant to Article 45 of the GDPR.

5. Data Retention Period

Personal data will be retained for the time necessary to fulfill the purposes for which they were collected and, in any case, no longer than **24 months** from the last useful contact or until the consent for promotional purposes is withdrawn.

6. User Rights

Data subjects may exercise their rights under Articles 15–22 of the GDPR at any time, including:

- access, rectification, or deletion of their data;
- restriction of or objection to processing;
- data portability;
- withdrawal of consent for marketing purposes.

Requests may be sent to: **milan@barnes-international.com**

Users also have the right to lodge a complaint with the **Italian Data Protection Authority** (www.garanteprivacy.it).

7. Consent for Marketing Communications

By selecting the appropriate checkbox on the landing page form, users may authorize Milano Luxury Realty S.r.l. to send promotional communications regarding Barnes properties and initiatives in Italy and abroad. Consent is optional and may be withdrawn at any time by writing to **milan@barnes-international.com**.

8. Updates

This Privacy Notice may be updated at any time. The most recent version will always be available on the official **Barnes New Development Italia** website and related landing pages.

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Exclusive distribution of the Sky Lo Milano T37-1 project in cooperation with **Kervis SGR S.p.A.**

Milano Luxury Realty S.r.l. operates under the **Barnes International Realty** network, in compliance with **EU Directive 2006/123/EC** and **Regulation (EU) 2016/679 (GDPR)**.