

EXHIBIT 5 – INFORMATION ON THE PROCESSING OF PERSONAL DATA (PRIVACY POLICY) FOR MARKETPLACE CUSTOMERS (EXHIBIT 5.A) AND INFORMATION ON THE PROCESSING OF PERSONAL DATA (PRIVACY POLICY) FOR THE SELLER (EXHIBIT 5.B)

EXHIBIT 5.A

PRIVACY POLICY PURSUANT TO ART. 13 OF LEGISLATIVE DECREE No. 196 OF 30 JUNE 2003 (“PERSONAL DATA PROTECTION CODE”)

Recitals

The following privacy policy has been drawn up pursuant to Art. 13 of the Personal Data Protection Code, by PB Online Srl s.r.l., in relation to personal data provided by users when accessing and/or registering on the website www.eprice.it (“Website”) or when making a purchase on the same Website. PB Online Srl is the owner of the Website, where it operates as a provider of registration and sales services.

The Website hosts an IT platform, designed and managed by PB Online Srl, which also allows access to third-party sellers, other than PB Online Srl (“**Third-party Sellers**” or “**Sellers**”), and purchasers for the purpose of buying and selling goods and/or services online (“Platform”). The Platform houses the MarketPlace, namely, the virtual space created and run by PB Online Srl, where Third-party Sellers can offer and sell their products and complete related purchasing contracts with users. The Third-party Sellers are identifiable by clicking on the Seller’s name in the product sheet selected by users or, should the same product be offered by several Sellers, by clicking on the Seller’s name in the section “Other Sellers”-“Altri Venditori”, in the product sheet selected by users.

Therefore, on the Website users can purchase products sold by PB Online Srl or by Third-party Sellers, after registering on the Website.

As a provider of the registration service, seller, manager of the MarketPlace, and sole party in charge of identifying and implementing the technical and organisational procedures that govern the processing of the personal data stored on the Platform, **PB Online Srl** assumes the role of “**Data Controller**”, in compliance with Art. 4, 1st paragraph, letter f) of Legislative Decree no. 196/2003 (“**Personal Data Protection Code**”)¹, of personal data provided by users on the Website for the purposes set out in point 2 indicated below.

With regard to the personal data provided by users at the time of purchasing a product from a **Third-party Seller** - as identifiable by clicking on the Seller’s name in the product sheet selected by users or, should the same product be

offered by several Sellers, by clicking on the Seller’s name in the section “Other Sellers”-“Altri Venditori” in the product sheet selected by users - the Third-party Seller will assume the role of autonomous “**Data Controller**” for processing **personal data provided by users on the order form** – except for the e-mail address – **exclusively** in order to perform **activities related to the completion of the online purchase and to fulfil administrative and accounting obligations** arising for the Seller from the execution of the contract. The Seller will acquire such data only after completion of the online purchasing procedure. For the same purposes, the Third-party Seller will also be the autonomous Data Controller for any personal data provided by users in any correspondence that users may send to the Seller concerning post-sales activities, via the messaging system on the MarketPlace (most notably, through the sections “Contact the seller” – “Contatta il Venditore”, “Evaluate the Seller” – “Valuta il Venditore” and “Request a return” – “Chiedi un reso”).

The following privacy policy is provided, pursuant to Art. 13 of the Personal Data Protection Code, in connection with the processing of personal data provided, gathered or, in any case, processed through the Website, also with reference to all Third-party Sellers, - as identifiable by clicking on the Seller’s name in the product sheet selected by users or, should the same product be offered by several Sellers, by clicking on the Seller’s name in the section “Other Sellers”-“Altri Venditori” in the product sheet selected by users - each time the user purchases a product from a Third-party Seller, and not from PB Online Srl, **for the activities described in the following points 1 to 7**, as better specified below.

1. Data Controller

The Data Controller for the processing of personal data is PB Online Srl Operations s.r.l., a company with sole quotaholder, registered office at Corso Venezia 45 - 20121 Milan (MI), Italia, VAT No./Tax Code 12429590966. **With exclusive reference to the case of purchase of a product sold - on the MarketPlace - by a Third party Seller** - as identifiable by clicking on the Seller’s name in

note¹ Data Controller”: the natural or legal person, public administration or any other organisation, association or body responsible, even jointly with another data control

the product sheet selected by users or, should the same product be offered by several Sellers, by clicking on the Seller's name in the section "Other Sellers"- "Altri Venditori" in the product sheet selected by the user - **the Third- party Seller will assume the role of autonomous Data Controller** for the user's personal data provided on the order form (except for the e-mail address that will not be acquired by the Seller in any way), and any correspondence related to the online purchase, exchanged via the messaging system of the MarketPlace (notably, through the sections "Contact the seller" – "Contatta il Venditore", "Evaluate the Seller" – "Valuta il Venditore" and "Request a return" – "Chiedi un reso", accessible to the user registered on the Website). In this case, the following provisions of this privacy statement will apply, also to the Third-party Seller:

- point **2** (Purpose of processing) **only for the purposes referred to in letters (b) – execution of the contract and post-sales assistance - and (c) - administrative and accounting activities - and in the paragraph "sensitive data"**;
- point **3** (Provision of data and consequences in the event of failure to consent to processing) **only for the purposes referred to in letters (b) and (c) of point 2**;
- point **4** (Data processing methods);
- point **5** (Disclosure of data) **limited to points from (v) to (viii)**;
- point **6** (Data Storage), **last paragraph**;
- point **7** (Right of access to personal data).

2. Purposes of processing

PB Online Srl will handle the personal data provided by users for the following purposes:

- a. to allow registration on the Website and use of the services reserved for registered users, including the possibility of making online purchases also on the MarketPlace.
- b. to allow the execution of the purchase contract and the proper performance of operations connected with it, including any post-sales assistance. Moreover, even if not registered, users will be able to send requests for information or explanations about the products on sale on the Website. To handle such requests, PB Online Srl will require the provision of certain personal data (e.g. name, surname and e-mail address);
- c. for administrative and accounting purposes, and to fulfil legal obligations;
- d. with the user's prior consent, to send information and promotional materials (including the "newsletter"), discount vouchers and special offers, by PB Online Srl Operations s.r.l., with regard to products and services provided by PB Online Srl or by third parties, as well as for carrying out market research by e-mail and by the postal service (so called "**marketing**" purposes);
- e. with only reference to the e-mail addresses provided by the user when purchasing a product or a service offered and sold on the Website by PB Online Srl

directly, to allow the direct sale of similar products or services without the need for the explicit prior consent of the data subject (as per Article 130, 4th paragraph, of the Personal Data Protection Code), and provided that the user does not exercise the right of objection as described in point 3 below (so called. "**soft spamming**");

- f. upon the user's prior explicit consent, to allow PB Online Srl to process the user's consumer choices and purchasing habits by identifying the type and frequency of purchases made on the Website, in order to send information and/ or advertising materials of specific interest to the user by e-mail and to improve the proposals sent by PB Online Srl (so called "**profilazione**").

It should also be noted that:

Authentication Credentials

PB Online Srl will process the registration data in order to offer the user registered with the Website the opportunity, if the same wishes, to register with one of the following websites: www.eprice.it, where PB Online Srl operates as a provider of a registration and sales service and as the data controller for processing the personal data of registered users, using the same registration credentials as the Website ("Websites Powered by PB Online Srl "). The user will be notified of this opportunity before accessing each of the Websites Powered by PB Online Srl and, in any case, only after being invited to read the privacy policy of the Websites Powered by PB Online Srl that the user intends to access with the same registration credentials used for the Website. If the user has given consent to the sending of promotional materials at the time of registering and/or making a purchase on the Website and has subsequently logged in to one of the Websites Powered by PB Online Srl with the same authentication credentials as the Website, the user will not receive promotional materials concerning the Websites Powered by PB Online Srl other than the Website, unless the user explicitly makes a request to receive such information, by selecting the appropriate option on the personal account of each of the other Websites Powered by PB Online Srl .

Data relating to the credit card

To make a payment on the Website by credit card, the user needs to provide credit card details (card number, holder, expiry date and security code). Such data will be acquired by the payment service provider, which will act as an autonomous data controller, without passing through the server belonging to PB Online Srl , which will, therefore, not process this data in any way. The data will be acquired in encrypted format and in accordance with the security requirements provided for by the PCI certification. The payment service uses the SSL (Secure Sockets Layer) Protocol. The user can request, via the Website, the saving of the data, but the data will be saved directly by the payment service provider and will not be acquired by PB Online Srl , which will only keep track of the last four digits of the credit card number, solely and exclusively in order to prevent any fraud concerning online payments. It should be noted that, even if the payment made is for purchasing

a product from a Third-party Seller on the MarketPlace, the credit card data will not be disclosed to the Seller.

Data provided for the “Say it by e-mail”- “Dillo via e-mail” service

When navigating on the Website, registered and non-registered users will be able to indicate one or more products to their friends/contacts if they provide their name and e-mail address, as well as the name and e-mail address of the friend. Users shall be aware that PB Online Srl will not retain such data after the e-mail has been sent, other than for the time strictly required to document the fact that users’ requests have been handled. To use this service, data subjects need to be able to legitimately use the data of their friends/contacts.

Sensitive Data

To register with the Website and to make a purchase via the Website, the provision of sensitive data is never requested. The user may, instead, be requested to provide documents proving the existence of a disability, and therefore the provision of sensitive data, if the user intends to benefit from the reduced VAT rate for the purchase of a product that allows the application of said regime, pursuant to Law No. 30 of 28 February 1997. The data provided in this way will be processed by the seller of the product, be it PB Online Srl or a Third-party Seller, for the sole purpose of allowing the seller of the product to comply with the provisions of Law No. 30 of 28 February 1997, regarding the application of the reduced VAT rate.

Navigation Data

Users can access the Website and view the products offered for sale without being asked to provide any personal data. However, during their normal operation, the computer systems and software used to operate the Website acquire some personal data, whose transmission is implicit when using internet communication protocols. Such data are not collected for the purpose of being associated with identified data subjects; however, also in consideration of their nature, they could make it possible to identify the user through processing or associating procedures.

This category includes IP addresses or domain names of the computers used by users who access the Website, the URL addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file received in reply, etc. Such data are used to extract anonymous statistics on the use of the Website (most notably, the number of accesses) and to check proper functioning. In this process, the processing of data for direct identification is not provided.

With the aforesaid methods, browsing data will be acquired exclusively by PB Online Srl .

3. Provision of data and consequences of failure to consent to processing

The provision of data for the purposes referred to in letters (a), (b) and (c) in point 2 above is optional. However, since

such processing is required in order to enable registration on the Website and the provision of reserved services, including the online purchasing service, any refusal to provide the data in question will make it impossible to register with the Website and/or to complete an online purchase. With reference to the purposes of processing referred to in letters (d) (“marketing”) and (f) (“profiling”) in point 2 above, consent to the processing of personal data is purely optional and can be given by selecting a relevant box, for each separate purpose, at the bottom of the registration form for the Website. Failure to consent will not affect the ability to register with the Website and/ or to make purchases on it, and will only imply the consequences set forth below:

- failure to consent to the processing of personal data for the purposes referred to in point 2, letter (d) (“marketing”) above will make it impossible to receive any information or promotional materials (including the “newsletter”), discount vouchers and special offers from PB Online Srl with regard to the products and services of PB Online Srl or third parties, or to carry out market research by e-mail and the postal service;
- failure to consent to the processing of personal data for the purposes referred to in point 2, letter (f) (“profiling”) above will make it impossible for PB Online Srl to carry out any analysis of the user’s consumer choices, by identifying the type and frequency of the purchases made on the Website in order to send information and/or advertising materials of specific interest to the user.

In any case, the user may revoke any consent given for the purposes described in letters (d) (“marketing”) and (f) (“profiling”) in point 2, namely, object to processing for the purposes referred to in letter (e) (“soft spamming”), by contacting PB Online Srl at the address specified in point 1 above. Moreover, solely for the purposes described in letters (d) (“marketing”) and (e) (“soft spamming”) in point 2 above, the user will be able to object to the processing of personal data also via the special link at the bottom of any e-mail containing promotional materials sent by PB Online Srl . Any refusal expressed through such procedures will be effective also in connection with the shipment of information via the postal service.

4. Data processing methods

Data processing will be mainly carried out with the aid of electronic or automated tools, in the manner and with the appropriate resources to ensure the security and confidentiality of the data, in compliance with the provisions of the Personal Data Protection Code. In particular, all technical, IT, organisational, logistical and procedural security measures will be taken to guarantee the minimum level of protection for the data as provided by law. Access will only be granted to those in charge of data processing designated by the Data Controller or to data processors appointed by the Data Controller.

PB Online Srl does not intend to transfer personal data to Countries not belonging to the EU or EEA.

With reference to a Third-party Seller, should it decide to transfer the data processed for the purposes mentioned

in point 2 (b) and (c) above to a Country not belonging to the European Union or the European Economic Area, it is understood that such transfer shall be carried out (i) in accordance with a decision of the European Commission acknowledging that the Country to which data are transferred ensures an adequate level of protection or, in the absence of such a decision (ii) pursuant to adequate safeguards, such as the standard contractual clauses adopted by the European Commission under Art. 26(4) of EU Directive 95/46/ EC, or pursuant to binding corporate rules "BCR", in accordance with Art. 44 (1) (a) of the Personal Data Protection Code. The user is entitled to request to the Third-party Seller, to the address quoted in point 1 above, any further information regarding the transfer modalities, including the information as to where the data have been made available.

5. Data Communication

The personal data provided by the user for the purposes described in Point 2 above may be transmitted or disclosed to the following parties:

- (i) companies in the PB Online Srl group, to which PB Online Srl belongs, and/or employees and/or collaborators of PB Online Srl and/or the PB Online Srl group, in order to carry out administrative, accounting and IT and logistical support activities, who act as appointed data processors and persons in charge of data processing respectively;
- (ii) companies or consultants appointed for the installation, maintenance, updating and, in general, the management of hardware and software of PB Online Srl (including the Platform);
- (iii) companies appointed by PB Online Srl to send information online;
- (iv) those appointed to repair products purchased under the legal guarantee of conformity, in the event that PB Online Srl acts as the seller of the purchased product;
- (v) those appointed to repair products purchased under the legal guarantee of conformity, in the event that PB Online Srl acts as the seller of the purchased product;
- (vi) those appointed to repair products purchased under the legal guarantee of conformity, in the event that PB Online Srl acts as the seller of the purchased product;
- (vii) those (including public authorities) who have access to data by virtue of legislative or administrative orders;
- (viii) those, other than those listed above, appointed as data processors or persons in charge of data processing by the Seller, in order to carry out activities connected with the execution of the purchase contract, in all cases in which the user purchases a product sold by a Third-party Seller on the MarketPlace.

No personal data provided by users for the purpose of registering with the Website and/or purchasing via the

Website are subject to disclosure. The updated list of data processors and persons in charge of data processing can be consulted at the headquarters of the Data Controllers.

6. Data Storage

Personal data will be stored exclusively for the period required in order to ensure the proper performance of the services offered.

In case of closure of the account on the Website upon the user's request, the data contained therein will be retained for administrative purposes for a maximum period of three months, except in case of specific requirements set forth by law on the storage of accounting documents or for public security purposes.

In any case, it is understood that personal data will be stored and processed for the purposes under letters (d) "marketing" and (f) "profiling" at point 2 above, for the period allowed by law and the provisions of the Italian Data Protection Authority. At the end of said period, PB Online Srl may request that the user renew his or her consent to the processing of personal data for said purposes or to make them anonymous and retain them exclusively for statistical purposes.

In connection with the processing carried out by each Third-party Seller - as identifiable by clicking on the Seller's name in the product sheet selected by users or, should the same product be offered by several Sellers, by clicking on the Seller's name in the section "Other Sellers"- "Altri Venditori" - in the product sheet selected by user, with reference to the activities indicated at point 2, letter (b) - execution of the contract and post-sales assistance - and (c) -administrative-accounting activities - above, personal data will be stored for the time set forth by provisions regulating the retention of contractual and accounting documents, and in any case for the time allowed and for public security purposes.

7. Right of access to personal data

Pursuant to Art. 7 of the Personal Data Protection Code, the user is entitled to do what follows:

- a. receive confirmation as to the existence of personal data concerning the same and their communication in a clear way;
- b. receive from each Data Controller:
 - information on the source of such personal data, the purposes and methods of processing, the logics adopted in connection with data processing carried out using electronic tools;
 - information on the identification data concerning each Data Controller;
 - information on the entities or classes of entities to whom the data may be transmitted or that might receive them, as representatives designated for the Italian territory, as data processors or persons in charge of data processing;
- c. obtain:
 - updates, corrections or supplements in

connection with the data concerning the same;

- the deletion, anonymisation or blocking of data processed in violation of the law, including those that must be stored for the purposes for which the data have been collected or subsequently processed;
- evidence of the fact that those to whom said data have been disclosed or transmitted have been informed of the operations indicated in the points above, including the relevant content, unless such obligation is impossible to fulfil or requires the use of means clearly disproportionate to the protected right at hand;

d. object, in part or in full:

- for legitimate reasons to the processing of data concerning the same, even if relevant to the purpose of their collection;
- to the processing of personal data concerning the same, for commercial information, the shipment of advertising materials or direct sales, market research or commercial communications.

The aforesaid rights may be exercised with request to the Data Controller, at the address indicated at point 1 of this policy.

The data subject's right to oppose to the processing of personal data for commercial communication purposes carried out using automated contact methods (email or fax) is extended also to traditional means (the postal service), without prejudice to the possibility for the data subject to exercise his or her rights partially, pursuant to Art. 7, 4th paragraph, letter b) of the Personal Data Protection Code, for example by objecting exclusively to the shipment of promotional messages through automated means.

EXHIBIT 5.B

PRIVACY POLICY PURSUANT TO ART. 13 OF LEGISLATIVE DECREE No. 196/2003 (“PERSONAL DATA PROTECTION CODE”)

This information is provided by PB Online Srl for all Sellers joining the MarketPlace. Unless otherwise specified, the capitalised words used herein will have the same meaning as indicated in the Contract.

1. Data Controller

The data controller for the processing of personal data is PB Online Srl Operations s.r.l., a company with sole quotholder, registered office at Corso Venezia 45 - 20121 Milan (MI), Italy, VAT No./Tax Code 12429590966

Purposes of processing

In its capacity as the manager of the MarketPlace, PB Online Srl will handle the personal data provided by Seller in the Application Form and the Authentication Details used by the Seller for registering on the Transaction Platform and, more in general, the data provided by the Seller in the contractual relation with PB Online Srl in connection with the performance of the obligations arising out of the performance of the Transaction Platform Access and Use Service, the MarketPlace Participation Service, the Sales Service and, whenever requested by the Seller, the Logistics Service provided by PB Online Srl and outlined in the Contract, as well as for administrative and accounting purposes and in order to enable PB Online Srl to comply with legal requirements, regulations, and the requests of public authorities.

Upon the Seller’s prior consent, PB Online Srl may also process personal data for the purpose of sending commercial communications concerning products or services, either of PB Online Srl or of third parties, that could be of interest to the Seller, by way of automated systems (e.g. by email or fax) or via the postal service.

2. Provision of data and consequences of failure to consent to processingo

The provision of data for the purposes referred to in the first paragraph of point 2 above is optional and does not require the data subject’s prior consent. However, failure to provide said data might result in PB Online Srl being unable to enter into the Contract with the Seller, or fulfil, in part or in full, its obligations under the Contract.

The provision of data for the purposes indicated in the second paragraph of point 2 above is optional and requires the data subject’s prior consent. Failure to consent will not affect the possibility of entering into the Contract and/or registering with the Transaction Platform, and will only result in PB Online Srl not being allowed to send commercial messages that are not strictly related to the performance of the Contract.

3. Data processing methods

Data processing will be mainly carried out with the aid of electronic or automated tools, in the manner and with the appropriate resources to ensure the security and confidentiality of the data, in compliance with the provisions of the Personal Data Protection Code. In particular, all technical, IT, organisational, logistical and procedural security measures will be taken in order to guarantee the minimum level of protection for the data as provided by law. Access will only be granted to those in charge of data processing designated by the Data Controller or to data processors appointed by the Data Controller.

4. Data Communication

The personal data provided by the Seller for the purposes described in Point 2 above may be transmitted or disclosed to the following parties:

- (i) Companies Within the Group and/or employees and/or collaborators of PB Online Srl and/or Companies Within the Group, in order to carry out administrative, accounting and IT and logistical support activities, which act as appointed data processors and persons in charge of data processing respectively;
- (ii) companies or consultants appointed for the installation, maintenance, updating and, in general, the management of hardware and software of PB Online Srl (including the Transaction Platform);
- (iii) companies appointed by PB Online Srl to send information online;
- (iv) all public and/or private persons, natural and/or legal persons (legal, administrative and tax consulting firms), if such disclosure is necessary or appropriate to the proper performance of the obligations arising in connection with the management of the MarketPlace and, more in general, with the Contract, in addition to the obligations set forth by law;
- (v) forwarders and persons in charge of the delivery and/or collection of products purchased in connection with the Logistics Service, if applicable;
- (vi) a tutti quei soggetti (ivi include le pubbliche those (including public authorities) having access to data by virtue of legislative or administrative orders.

No personal data are subject to disclosure. The updated list of data processors and persons in charge of data processing can be consulted at the headquarters of the Data Controller

5. Data Storage

Personal data will be stored exclusively for the period required in order to ensure the proper performance of the services offered under the Contract, and for the time required by provisions concerning the storage of contractual and accounting documents or for purposes related to public security.

fax) is extended also to traditional means (the postal service), without prejudice to the possibility for the data subject to exercise his or her rights partially, pursuant to Art. 7, 4th paragraph, letter b) of the Personal Data Protection Code, for example by objecting exclusively to the shipment of promotional messages through automated means.

6. Right of access to personal data

Pursuant to Art. 7 of the Personal Data Protection Code, the Seller is entitled to do what follows:

- a. receive confirmation as to the existence of personal data concerning the same and their communication in a clear way;
- b. receive from the Data Controller:
 - information on the source of such personal data, the purposes and methods of processing, the logics adopted in connection with data processing carried out using electronic tools;
 - information on the identification data concerning the Data Controller;
 - information on the entities or classes of entities to whom the data may be transmitted or that might receive them, as representatives designated for the Italian territory, of data processors or persons in charge of data processing;
- c. obtain::
 - updates, corrections or supplements in connection with the data concerning the same;
 - the deletion, anonymisation or blocking of data processed in violation of the law, including data that must be stored for the purposes for which they have been collected or subsequently processed;
 - evidence of the fact that those to whom said data have been disclosed or transmitted have been informed of the operations indicated in the points above, including the relevant content, unless such obligation is impossible to fulfil or requires the use of means clearly disproportionate to the protected right at hand;
- d. object, in part or in full:
 - for legitimate reasons to the processing of data concerning the same, even if relevant to the purpose of their collection;
 - to the processing of personal data concerning the same, for commercial information, the shipment of advertising materials or direct sales, market research or commercial communications.

The aforesaid rights may be exercised with request to the Data Controller, at the address indicated at point 1 of this policy.

The data subject's right to oppose to the processing of personal data for commercial communication purposes carried out using automated contact methods (email or