

**REGULATION ART. 11 ITALIAN PRESIDENTIAL DECREE No. 430 OF 26 OCTOBER 2001**

**"GIRO DOC" PRIZE PROMOTION**

*Courtesy translation*

**1. Promoter**

The promoter is CONSORZIO TUTELA DOC DELLE VENEZIE, with head office in Via Pallone 20 – 37121 Verona, Vat No. And Tax Code 04418130276.

**2. Appointed Agencies**

The Appointed Agencies are:

- **Echo Srl** with registered office in Italy, Via Novara, 53 20143 Milano Tax Code and VAT No. 11636210152
- **Promosfera Srl** with registered office in Italy, Casorate Sempione (VA), Via XXV aprile 56, Tax Code and VAT No. 02250050024.

**3. Recipients**

The Prize Promotion is open to all +18 users registered on Instagram who hold a public Instagram account for the entire duration of this prize promotion.

Please note that having a public account is a necessary condition in order to be contacted in the event of winning. Otherwise, it will not be possible to notify the participant of any prize that may have been awarded.

Employees and/or collaborators of the Promoting Company are excluded from participation. Any person involved in the organisation and management of the Prize Promotion is also excluded.

*Notes regarding participation acquisition*

Please note that, in order for the participation to be properly acquired, **the user's Instagram profile must be public at the time the entry is uploaded, and not subsequently, and must not be subject to restrictions imposed by Instagram.** Should the participation be submitted through a private profile, or should the participant's profile be subject to restrictions, it will not be possible to acquire the participation and, therefore, the user will not be eligible to take part in the prize draw.

Participation in the Prize Promotion is permitted exclusively through posts published on the participant's own Instagram feed; therefore, any Instagram Stories will not be acquired for the purpose of identifying the winners.

Please note that, in order to carry out the checks required for the validation of prizes, any allocation to reserve winners or similar verifications, the entries must remain visible – and not removed – until the winner notifications have been sent. Should the entries be removed or the follow of the Promoter's profile be withdrawn, the participant shall forfeit any rights arising from participation in the Prize Promotion.

This Prize Promotion is in no way sponsored, endorsed, administered by, or associated with Instagram or any other social network. Any information provided by participants will not be managed by Instagram, but by the Promoting Company.

Instagram shall not be held liable for any issues arising in connection with the Prize Promotion. Each participant releases Instagram from any liability related to participation in this initiative.

**4. Duration of the Prize Promotion**

**From May 13 to June 21, 2026.**

The **jury** will be held **by June 30, 2026.**

**5. Promoted Brand and Purpose of the Prize Promotion**

The promoted brand is Pinot Grigio DOC delle Venezie.

This Prize Promotion is organized in order to increase the visibility of the promoted brand and, in particular, of encouraging engagement on the Promoting Company's social media page @dellevenezie.

**6. Entry and participation**

During the validity period of the Prize Promotion, in order to participate in this initiative, users shall:

- A. Upload, as a post (photo, video or reel – no stories), content on their public Instagram profile through the official Instagram application.

The uploaded content must comply with the theme of the Prize Promotion relating to the “Italian Lifestyle”, as well as with the criteria set out under Section 7 below.

Participants shall obtain the express authorisation of any third parties appearing in the photographic content. Minors may not be depicted.

- B. Include in the caption of the uploaded post:

- the official hashtag of the Prize Promotion: #GiroDOC;
- the mention of the Promoting Company’s social profile @dellevenezie;
- the mention of the legal page @partecipoeautorizzo, through which participants confirm their intention to participate in the Prize Promotion, accept these Terms and Conditions and provide the required consents.

By way of example, the post shall contain the following text:

**“#GiroDOC @dellevenezie @partecipoeautorizzo”**

- C. Follow the Promoting Company’s page @dellevenezie

The post published by the user that complies with the above requirements, together with the Instagram profile name and the caption included in accordance with the provisions set out above, shall be automatically acquired through a software application and stored in a database located in Italy.

Please note that:

- The file must comply with the technical specifications of the relevant social network;
- The Promoter reserves the right to exclude from the Prize Promotion any posts that do not comply with the requirements set out herein or that infringe copyright laws;
- Posts not including the hashtag and all the mentions indicated under Section 6.B shall not participate in the Prize Promotion;
- With regard to the mention @partecipoeautorizzo, please note that:
  - o “Partecipo” (which means “I want to participate”) confirms the user’s intention to participate in the Prize Promotion;
  - o “Autorizzo” (which means “I authorize”) authorizes the Promoter (data controller) to associate the participant’s social media username with the photo for purposes connected with the Prize Promotion, as well as authorizing the data processor to collect and store such content, together with the participation data, on a server located within Italy, in compliance with the requirements of Italian law.

### **6.1 Entry restrictions**

Each participant may enter the Prize Promotion only once and submit only one (1) piece of content.

## **7. Winners’ selection**

Among all participations received during the participation period, a panel appointed by the Promoter shall draw up a ranking from 1 to 10, whereby the participants ranked 1st, 2nd and 3rd shall be deemed winners of the prizes at stake, while participants ranked from 4th to 10th place shall be deemed reserve winners.

In particular:

- The participant ranked 1st shall win one 6 L podium bottle + a €500 travel voucher (Triveneto);
- The participant ranked 2nd shall win one 3 L podium bottle + a €200 travel voucher (Verona + wine tasting);
- The participant ranked 3rd shall win one 1.5 L podium bottle + one box containing 6 bottles of 0.75 L each (3 white and 3 rosé).

The content submitted shall be evaluated at the sole discretion of the appointed panel, according to the following criteria:

- Consistency with the “Italian Lifestyle” theme (score from 0 to 10 points): the extent to which the work is consistent with the theme of the Prize Promotion shall be assessed. The possible inclusion of the Pinot Grigio DOC delle Venezie product will also be taken into consideration, although this is entirely optional and not mandatory, with particular emphasis on the participant’s ability to showcase and enhance the product within the image;
- Creativity and originality (score from 0 to 10 points): the originality of the idea, the expressive capacity and the creative approach of the post shall be assessed;
- Aesthetic and technical quality (score from 0 to 10 points): the overall quality of the image shall be taken into consideration.

The maximum score that may be awarded to each work is 30 points.

The final ranking shall be determined by the sum of the scores assigned by each member of the panel.

All activities shall take place (by the date indicated under Section 4) in the presence of a notary public or of the official responsible for consumer protection competent for the relevant territory (pursuant to Article 9 of Presidential Decree no. 430 of 26 October 2001), appointed by the Promoter or the Delegated Entity, who shall verify compliance of the selections made with the evaluation criteria indicated above and may request — should they deem it appropriate — a revision of the ranking drawn up.

**With respect to the uploaded content, the following is specified:**

- Participation in the Prize Promotion is reserved **exclusively** for individuals who are of legal age (18 years old or older at the date of participation).
- Each participant is invited to create and share a photograph representing a moment emblematic of the “Italian Lifestyle”.
- The photographs must comply with applicable laws and with the principles of the Self-Regulatory Code of Commercial Communication adopted by the Istituto dell’Autodisciplina Pubblicitaria and, in particular, must not:
  - o depict or be directed at individuals under 18 years of age;
  - o encourage, even indirectly, excessive or irresponsible consumption of alcoholic beverages;
  - o associate alcohol consumption with physical performance, driving ability, or similar;
  - o depict potentially dangerous situations or behaviours inconsistent with responsible conduct;
  - o be offensive, inappropriate or contrary to public decency.
- The Promoter reserves the right to exclude from participation and/or remove, at any time, any content deemed non-compliant with the above requirements or with applicable regulations, as well as content generated using Artificial Intelligence.

Participation in this Prize Promotion implies full acceptance of these Terms and Conditions and of the principles of responsible consumption. Moderate and responsible consumption of alcoholic beverages is strongly recommended.

The winner may not Prize Promotion the prize awarded or request the corresponding cash value or an exchange/replacement for any reason. However, in the event that the Promoter is unable to deliver the prize won, it reserves the right to replace the prizes announced with prizes of equal or greater value (circular of 28 March 2002, point 9.6). Winners may not claim any compensation for any damage resulting from the acceptance and/or use of the prize.

**7.1 Reserves**

Participants ranked **from 4th to 10th place** shall be deemed reserve winners in the event that it is not possible, for any reason whatsoever, to award the prize to the originally selected winner.

Any prizes not awarded to the winning participants shall be assigned to the reserve winners, in accordance with their ranking order.

**8. Prizes**

Prize	Quantity	Unit value VAT included, where applicable	Total value VAT included, where applicable

<b>6 L PODIUM BOTTLE + €500 TRAVEL VOUCHER</b>	<b>1</b>	<b>€ 590,00</b>	<b>€ 590,00</b>
<b>3 L PODIUM BOTTLE + TRAVEL VOUCHER WITH WINE TASTING EXPERIENCE</b>	<b>1</b>	<b>€ 245,00</b>	<b>€ 245,00</b>
<b>1.5 L PODIUM BOTTLE + BOX OF 6 BOTTLES</b>	<b>1</b>	<b>€ 72,00</b>	<b>€ 72,00</b>
<b>TOTALE</b>			<b>€ 907,00</b>

**The total prize pool amounts to € 907,00 (VAT included, where applicable).**

**The value of the prizes shall be understood as the retail list price as of the date of drafting of these Terms and Conditions.**

### **8.1 Details of the prize**

#### €500 Travel Voucher (Triveneto)

The prize consists of a voucher for booking a stay in the Triveneto area.

Upon prize acceptance, the winner will be contacted by the travel agency responsible for managing the tailor-made booking.

The voucher does not entitle the holder to any change and cannot, under any circumstances, be exchanged for cash. If the total value of the selected services is lower than the value of the voucher, the winner shall not be entitled to any refund or compensation.

The trip must be taken by 30/04/2027, subject to availability at the time of booking.

High season periods, long weekends, public holidays, Christmas and Easter periods are excluded.

The booking must be made at least 45 days prior to the selected departure date.

The Promoter shall not be held responsible for any damages arising from acceptance and/or use of the prize.

The prize may be transferred to third parties, provided they are of legal age.

#### €200 Travel Voucher (Verona)

The prize consists of a voucher for booking a day trip to Verona including a wine tasting experience.

Upon prize acceptance, the winner will be contacted by the travel agency responsible for managing the tailor-made booking.

The voucher does not entitle the holder to any change and cannot, under any circumstances, be exchanged for cash. If the total value of the selected services is lower than the value of the voucher, the winner shall not be entitled to any refund or compensation.

The experience must be taken by 30/04/2027, subject to availability at the time of booking.

High season periods, long weekends, public holidays, Christmas and Easter periods are excluded.

The booking must be made at least 45 days prior to the selected departure date.

The Promoter shall not be held responsible for any damages arising from acceptance and/or use of the prize.

The prize may be transferred to third parties, provided they are of legal age.

### **9. Notification and delivery of prizes**

Winners will be notified via Direct Message (internal messaging system of Instagram) sent directly from the @dellevenezie profile. Winners must accept the prize **within 5 days** from receipt of the winning notification.

In the event of failure to respond within the above-mentioned timeframe, the prize will be awarded to the reserves (in order of selection). The reserve winners shall comply with the same acceptance procedures and deadlines.

Should a reserve winner also fail to accept the prize within the above deadlines, the prize will be donated to a non-profit organisation.

The Promoting Company assumes no responsibility in the event that any of the following occurs:

- the participant does not check Direct Messages for any reason or impediment;
- the participant deletes their Instagram profile;
- the participant deletes their participation.

Furthermore, the Participant is solely responsible for managing their Instagram profile, with particular reference to:

- checking Direct Messages containing instructions for claiming the Prize;
- adopting security measures to prevent unauthorised access to their profile by third parties.

*WARNING! - Depending on your personal IT security settings and those defined by "Internet providers" (e.g. Free, Alice, Fastweb, Yahoo, Gmail etc.), some email communications, although free of suspicious information and constantly guaranteed with special Antivirus and AntiSpam filters, may be recognised as SPAM or Junk Mail.*

In the event of non-use of the awarded prize due to causes not attributable to the Promoter, the prize shall nonetheless be deemed as awarded. The winner shall have no further claims whatsoever.

The prizes awarded to winners may not be subject to any commercial or promotional exchange.

The username of the winner may be made public on the Promoting Company's Instagram page, without prejudice to the winner's right to request anonymity.

The prizes will be delivered directly to the address provided by the winner during the acceptance phase.

The prizes will be delivered in compliance with Presidential Decree No. 430/2001 – Article 1, paragraph 3, as well as Regulation (EU) 2016/679 on the protection of personal data ("GDPR").

#### **10. Authorisations, representations and warranties regarding the content**

By submitting the content, participants authorise the Promoter to publish it on its website or other communication materials and to make the content and related data publicly available (if deemed appropriate), even after the final end date of this Prize Promotion.

The Promoting Company reserves the full right to remove or block any content featuring graphics or images considered offensive or contrary to public morals (including vulgar content, violent scenes, illegal activities, etc.), or that in any way infringes third-party rights by being defamatory, invading privacy, or violating any copyright.

By submitting their content, participants waive any rights thereto (which shall be granted to the Promoter) and shall not be entitled to claim any financial compensation for any future use. The content must be free of copyright restrictions and will not be returned.

By submitting the content, each participant assumes full responsibility for the content itself and, by agreeing to participate in the Prize Promotion, declares and warrants that:

- the submitted content is original and does not infringe any copyright and/or related rights and/or trademark rights, trade secrets, image rights or any other exploitation rights of any natural or legal person, whether commercial, industrial or intellectual property rights;
- they shall hold the Promoting Company, as well as its successors and assigns, fully harmless and indemnified from any adverse consequence, cost or damage arising from any breach of the above declaration and warranty. In particular, the participant shall defend and fully indemnify the Promoter against any damages (including costs) that the latter may be required to pay to third parties as a result of:
  - any action or cease-and-desist claim alleging that mere possession or use of the content by the Promoter infringes or has infringed copyright, trademark rights, patent rights, know-how, invention rights, image rights or any other exclusive rights of third parties;
  - any adverse consequences caused by the publication of content deemed offensive or contrary to public morals (including vulgarity, violent scenes, illegal activities, etc.).
- they are aware of and accept that the content submitted for participation in the Prize Promotion will be visible on the Instagram page @dellevenezie and may be used across all social media channels of the Promoter, Consorzio del Pinot Grigio delle Venezie;
- they have obtained, prior to submission of the content, the authorisation of any depicted individuals for the collection and publication of the information concerning them, as well as their image.

By submitting the content, participants authorise the Promoter to publish it on its website and to make it publicly available even after the final end date of this Prize Promotion.

### **11. Free participation**

Participation in the Prize Promotion is free of charge, except for any ordinary telephone or Internet connection costs necessary for participation.

### **12. Promotion advertising and Regulation**

The Promoting Company will communicate the Prize Promotion through its social media page (@dellevenezie), as well as through display materials during the Giro d'Italia races (of which the Promoter is an official sponsor).

The advertising message will comply with the provisions set out in these Terms and Conditions. The full Terms and Conditions will be made available to participants via a link in the bio of the @dellevenezie profile.

### **13. Territorial scope**

The Prize Promotion shall be valid throughout the Italian territory and in the Republic of San Marino.

### **14. Guarantees and compliance**

The collection of users' data on the web for participation in the Prize Promotion will be carried out through dedicated software for which a specific affidavit of correct functioning has been issued.

The Prize Promotion database will be hosted on a server located in Italy, with registered office in Italy.

In compliance with Presidential Decree No. 430/2001, Article 7, an appropriate guarantee has been provided to secure the full value of the prize pool.

This Prize Promotion is conducted in accordance with Presidential Decree 26 October 2001, No. 430, and in compliance with the guidelines set out in Circular 28 March No. 1/AMTC of the Ministero delle Imprese e del Made in Italy.

**Participation in this Prize Promotion implies the participant's unconditional and full acceptance of all rules and clauses contained in these Terms and Conditions, without any limitation whatsoever, including the stated value of the prizes at stake.**

In the event of clear and detectable attempts of fraud or false and inaccurate declarations, the Promoter reserves the right to immediately cancel the user account. Participation carried out through temporary accounts will be considered invalid (and therefore cancelled).

Should the Promoting Company or third parties appointed by it identify users participating through means or tools capable of circumventing randomness, or otherwise deemed suspicious, fraudulent, or in breach of the proper conduct of the initiative, such users will be excluded from participation and will not be entitled to any prize that may have been won.

The Promoting Company reserves the right to exclude from the Prize Promotion consumers who are found to have participated in bad faith (e.g. double identities, multiple registrations with different email addresses, etc.).

Therefore, the Promoting Company, or third parties appointed by it, reserves the right to take appropriate action against all participants as deemed necessary (including, where considered necessary, requesting proof of identity), in compliance with applicable laws.

The collection of participants' data shall be carried out in compliance with EU Regulation 2016/679 ("GDPR").

### **15. Electronic and digital tools**

The Promoter declines any responsibility for any access issues, obstruction, malfunction or difficulty relating to technical equipment, computers, telephone lines, cables, electronics, software and hardware, transmission and connectivity, internet connection, access to the online game, and mobile and fixed telephone networks that may prevent a user from participating in the Prize Promotion.

It also declines any responsibility for issues caused by the configuration of the user's device which may affect the user's performance during participation.

### **16. Recourse**

The Promoter does not intend to exercise the right of recourse of the withholding tax provided for by Art. 30 of Presidential Decree No. 600 of 29/09/73 and bears the related tax burden.

## 17. Non-profit beneficiary

Unclaimed or unassigned prizes, as distinct from refused prizes, will be donated to the Association "Amici della Guinea Bissau ODV", with registered office at Viale Cadorna 13 – 21052 Busto Arsizio (VA), Tax Code: 90030520127.

The Promoting Company reserves the right to deliver alternative goods or services which, by their nature, are deemed more suitable to support the activities of the beneficiary organisation, in any case ensuring an equivalent value.

## 18. Minors

It is prohibited for minors to participate

## 19. Processing of personal data

### PRIVACY NOTICE FOR PRIZE PROMOTION PARTICIPANTS

(pursuant to Articles 13 and 14 of EU Regulation 2016/679)

#### A. Data Controller

CONSORZIO TUTELA DOC DELLE VENEZIE, registered office at Via Pallone 20 – 37121 Verona, VAT and Tax Code 04418130276, represented by its pro tempore Legal Representative, is the Data Controller for the personal data of participants in prize promotions directly organised by the Consortium (hereinafter "Controller").

Contact details:

- Email: [info@dellevenezie.it](mailto:info@dellevenezie.it)
- Certified email (PEC): [consorzio@pec.dellevenezie.it](mailto:consorzio@pec.dellevenezie.it)

#### B. Data Processor

The Controller has appointed, pursuant to Article 28 GDPR, the following entity as Data Processor: Agenzia Echo S.r.l., registered office at Via Novara 545, 20153 Milan, Tax and VAT Code 11636210152, represented by its pro tempore Legal Representative, acting as Data Processor for activities relating to the organisation and promotion of the prize promotion.

#### C. Sub-Processor

The Data Processor has appointed, with the prior authorisation of the Controller, Promosfera S.r.l., registered office in Casorate Sempione (VA), Via XXV Aprile 56, CAP 21011, VAT Code 02250050024, as Sub-Processor pursuant to Article 28(4) GDPR, for the operational management of the prize promotion, including, by way of example:

- management of participation platforms;
- collection and registration of entries;
- winner selection;
- management of prize allocation and dispatch;
- administrative obligations connected to the promotion.

#### D. Origin of Personal Data

Personal data are collected, on behalf of the Controller, by the Data Processor and the Sub-Processor, depending on the operational participation methods applicable to the promotion. In such cases, the processing of personal data is carried out in accordance with Article 14 of EU Regulation 2016/679.

#### E. Categories of Data Processed

The Controller processes, by way of example and depending on the applicable participation methods, the following data:

- personal and identification data (first name, last name, date of birth);
- contact details (address, telephone number, email, certified email where applicable);
- tax-related data in the event of a win (tax identification code, identity document);
- any data contained in communications with the Promoter;
- images or video recordings, only where provided for by the promotion rules and subject to consent;
- any additional data required by the full T&Cs of the promotion.

#### F. Purposes of Processing and Legal Basis

Personal data are processed for the following purposes:

- Management of the prize promotion** Participation in the promotion, verification of eligibility requirements, identification of winners, prize allocation and delivery, management of communications with participants. *Legal basis: Article 6(1)(b) GDPR – performance of a contract to which the data subject is party.*
- Compliance with legal obligations** Obligations arising from Presidential Decree No. 430 of 26 October 2001, as well as applicable tax, administrative and accounting legislation. *Legal basis: Article 6(1)(c) GDPR – compliance with a legal obligation.*
- Handling of disputes, complaints or legal proceedings.** *Legal basis: legitimate interest of the Controller (Article 6(1)(f) GDPR).*

#### G. Processing Methods

Processing is carried out by the Controller, the Data Processor and the Sub-Processor in accordance with the instructions issued by the Controller and with appropriate technical and organizational measures pursuant to Article 32 GDPR.

## **H. Disclosure and Recipients of Data**

Personal data may be disclosed to:

- Echo S.r.l., as Data Processor;
- Promosfera S.r.l., as Sub-Processor;
- third-party service providers supporting the management of the promotion (e.g. hosting providers, couriers, IT suppliers), appointed where necessary as Data Processors or authorized to process data;
- competent authorities, in fulfilment of legal obligations;
- tax and Legal advisors;
- notaries or Chamber of Commerce officials responsible for prize draw and closing operations;
- logistics companies for prize delivery;
- IT companies and cloud service providers.

An up-to-date list of data recipients is available upon request by contacting the Controller at the details provided above.

## **I. Data Dissemination**

Participants' data will not be disseminated, except for the publication of winners' first and last names on official websites or channels, where provided by the promotion rules.

## **J. Transfers to Third Countries**

Data may be processed on servers located in third countries (e.g. the United States) through cloud services. In such cases, transfers will be carried out in accordance with Articles 44 et seq. GDPR, with entities adhering to the Data Privacy Framework or by means of Standard Contractual Clauses (SCCs) approved by the European Commission.

## **K. Data Retention Period**

Personal data are retained for the time necessary for the management of the promotion and, thereafter, for the period prescribed by applicable legislation, including administrative and tax retention obligations. Data processed for marketing purposes will be retained until consent is withdrawn.

## **L. Nature of Data Provision**

The provision of data is necessary in order to participate in the promotion and receive any prizes. Refusal will make participation impossible. Consent to processing for promotional purposes is, by contrast, optional.

## **M. Data Subject Rights**

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

- right of access;
- right to rectification;
- right to erasure;
- right to restriction of processing;
- right to data portability;
- right to object;
- right to withdraw consent, where given.

Requests may be sent to the Controller at the contact details indicated in Section A.

Data subjects also have the right to lodge a complaint with the Italian Data Protection Authority pursuant to Article 77 GDPR (Piazza Venezia 11, 00186 Rome – [www.garanteprivacy.it](http://www.garanteprivacy.it) – [garante@gdp.it](mailto:garante@gdp.it)).

## **N. Automated Decision-Making**

The Controller does not carry out processing based on automated decision-making processes, nor any profiling activities.

## **O. Updates to This Notice**

This notice may be updated in the event of regulatory or organisational changes.

**Delegated Company**  
**Promosfera srl**

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*Disclaimer: This document is a translation of the original version drafted in Italian. In the event of any discrepancies, the Italian version shall prevail.*