

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

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (the “Regulation”), Actalis S.p.a. (“Actalis” or “Data Controller”) hereby provides below to its customers, including potential customers, as well as third parties in general (e.g. delegates, legal representatives, etc.) who come in contact with Actalis on behalf of or as mandated by customers, including potential customers (the “Data Subjects”), the information required by law relating to the processing of their personal data (“Data”).

### ABOUT US

<b>Data Controller</b>	Through its pro tempore legal representative, Actalis S.p.A., with registered office in Ponte San Pietro (BG) at Via San Clemente No.53 <a href="mailto:privacy@staff.aruba.it">privacy@staff.aruba.it</a>
<b>Data Protection Officer (DPO)</b>	<a href="mailto:dpo@staff.aruba.it">dpo@staff.aruba.it</a>

### HOW WE COLLECT PERSONAL DATA

The data processed by the Data Controller are acquired as follows:

- from the Data Subject, also through remote communications techniques used by the Data Controller (e.g. websites, smartphone and tablet apps, call centers, etc.);
- from third parties (e.g. those arranging transactions for the Data Subject, business information etc.).

Data from public sources, such as public registers, lists, public domain documents (e.g. financial statements, information contained in the register of companies at the Chambers).

### WHAT DATA WE PROCESS

CATEGORY OF DATA	EXAMPLES OF DATA TYPES
Personal information	Name, surname, street address, nationality, province and municipality of residence, phone number, taxpayer ID number, email address, details of identity document of which a copy is acquired where applicable. Name, surname, street address, nationality, province and municipality of residence, landline and/or mobile phone number, fax, taxpayer ID number, email address. Requests to issue certificates (online form) and documents provided by the applicants, public keys provided by the applicants and personal information of the applicants and Data Controllers (in the event of being different parties); results of checks performed by the CA; Certificate suspension or revocation requests.
Banking information	IBAN and banking/postal account information (except for Credit Card number)
Log	Source IP address, Log (system and network), originating IP addresses associated with compilation of the remote form and the logs on the associated transactions

### WHY ARE THE DATA SUBJECT'S DATA NEEDED?

PURPOSES OF THE PROCESSING	LEGAL BASIS
<b>Registration and management of contact requests and/or information materials</b> Your personal data is processed to implement preliminary actions and information materials and to comply with legal requirements. those following a registration request, to manage information and contact requests, and/or to send informational materials, as well as to satisfy any and all other obligations arising herewith.	The legal basis for this processing is to provide the services relating to a request for registration, information and contact and/or to send The provision of the data is optional. However if the Data Subject refuses to provide the data, it will not be possible for the Data Controller to provide the requested service.

### Management of the contractual relationship

The Data Subject's personal data are processed to implement actions in preparation of and following the purchase of a Service and/or a Product, such as management of the relevant order, provision of the Service itself and/or production and/or shipping of the purchased Product, related invoicing and payment management, handling of any claims and/or notifications to the support service and provision of the support itself, sending communications for information as well as fulfilment of any and all other obligations arising from the contract.

The legal basis for this processing is to provide the services relating to the contractual relationship and to comply with the legal requirements. The provision of the data is optional. However if the Data Subject refuses to provide the data, it will not be possible for the Data Controller to provide the requested service.

### Defending a right in court or out of court

The Data Subject's personal data are processed to ascertain, exercise or defend a right of the Data Controller and/or to defend itself against third-party claims, in court or out of court.

The legal basis of the processing is the pursuit of the legitimate interest of the Data Controller, given the balance of rights of the latter and the Data Subject.

### Information Security

The Data Subject's personal data are processed to ensure network and information security, the protection of corporate assets and corporate systems.

The legal basis for this processing is to comply with the law and to pursue the legitimate interests of the Data Controller, given the balance of rights of the latter and the Data Subject.

The Data Subject has the right to object at any time to the processing of respective personal data for the purpose in question, on grounds relating to his or her personal situation.

### Fraud prevention

The Data Subject's personal data are processed to allow checks that monitor and prevent fraudulent payments by software systems running automated checks, prior to the negotiation of Services/Products. If these checks return a negative result it will be impossible to complete the transaction; the Data Subject may, in any case, express his or her opinion, request an explanation, or challenge the decision by sending his or her justifications to Customer Support or to [privacy@staff.aruba.it](mailto:privacy@staff.aruba.it).

The legal basis of the processing is the pursuit of the legitimate interest of the Data Controller, given the balance of rights of the latter and the Data Subject.

The Data Subject has the right to object at any time to the processing of respective personal data for the purpose in question, on grounds relating to his or her personal situation.

### Promotional activities for Services/Products similar to those purchased

The Data Subject's personal data are processed in order to send emails relating to promotions and offers on the Data Controller's Services/Products identical and/or similar to those covered by the current contract with the Data Subject, unless the Data Subject objects to the processing, initially or during subsequent communications.

The legal basis for the processing is Article 130, paragraph 4 of the Italian Privacy Code (Legislative Decree n. 196/2003). The Data Subject has the right to object at any time to the processing of his/her personal data for the purpose in question.

### Promotional activities for Services/Products offered by Actalis and Aruba group Companies

The processing of the personal data of the Data Subject is carried out for the purpose of sending, under his/her prior specific consent, newsletters and communications regarding offers, discounts and promotions for Services/Products provided by the Data Controller and by the companies of the Aruba Group through traditional means (e.g. ordinary mail, telephone calls with an operator) and/or automated means (e.g. e-mail, text messages, online instant messaging applications, web and mobile push notifications).

The legal basis of this processing is the consent initially granted by the Data Subject for the processing itself, which may freely be withdrawn at any time, without prejudice to the lawfulness of any previous processing.

If the Data Subject refuses to give his or her consent, the Data Controller will be unable to send promotional communications, without this entailing detrimental consequences on the existing contractual relationship.

### Taking part in surveys/research

The Data Subject's personal data is processed by the Data Controller so that, with specific consent, invitations can be sent out for participation in surveys and market research, using traditional methods (e.g. ordinary mail, telephone calls with operator) and/or automated methods (e.g. e-mail, text messages, online instant messaging applications, web and mobile push notifications).

The legal basis of this processing is the consent initially granted by the Data Subject for the processing itself, which may freely be withdrawn at any time, without prejudice to the lawfulness of any previous processing. Any refusal of consent by the Data Subject makes it impossible to involve him/her in surveys and market researches, without this having detrimental consequences on the existing contractual relationship.

### Profiling

The Data Subject's personal data are processed by the Data Controller, subject to specific consent, for profiling purposes such as the analysis of the transmitted data and the purchased Services/Products in order to offer advertising messages and/or commercial proposals in line with choices made by users.

The legal basis of this processing is the consent initially granted by the Data Subject for the processing itself, which may freely be withdrawn at any time, without prejudice to the lawfulness of any previous processing. If the Data Subject refuses to give his or her consent, it will not be possible to send him/her commercial communications in line with the Data Subject's preferences, without this entailing detrimental consequences on the existing contractual relationship.



## WHO WE COMMUNICATE THE DATA SUBJECT'S DATA TO

### CATEGORIES OF RECIPIENTS

### PURPOSE

Companies belonging to the Aruba S.p.A. Group ("Aruba Group")

Fulfillment of administrative and accounting requirements, as well as those connected with the services requested

Third-party providers and companies belonging to the Aruba Group

Performance of services (assistance, maintenance, delivery/shipping of products performance of additional services, providers of networks and electronic communication services) associated with the requested service  
Promotional/advertising activities only if the Data Subject has provided specific consent to marketing

Credit and electronic payment institutions, banks/post offices

Managing deposits, payments, reimbursements associated with the contractual service

External professionals/consultants and consulting firms

Fulfillment of legal requirements, exercising rights, protecting contractual rights, credit recovery

Financial Administration, Public Agencies, Legal Authorities, Supervisory and Oversight Authorities

Fulfillment of legal requirements, defense of rights; lists and registers held by Public Authorities or similar agencies based on specific regulations relating to the requested service

Formally mandated subjects or those with recognized legal rights

Legal representatives, administrators, guardians, etc.

Persons belonging to these categories operate independently as separate data controllers or as data processors appointed by the Data Controller. The Data Controller's personnel, who are all specially authorized for processing, including interns, temporary workers and consultants, may also have knowledge of the Data, in relation to the performance of their assigned tasks.

In no case shall personal data be disclosed and they shall not, therefore, be accessible by undefined parties, in any form, for example by them being made available or subject to consultation.



## HOW WE PROCESS THE DATA SUBJECT'S DATA

The data shall be processed using manual, electronic and remote means and in accordance with the requirements set by the relevant legislation, which seeks to ensure the confidentiality, integrity and availability of the Data, and to avoid pecuniary and non-pecuniary losses.



## WHERE WE PROCESS THE DATA SUBJECT'S DATA

The Data Subject's data is stored in archives located in European Union countries. Where necessary for the pursuit of the stated purposes, the Data Subject's Data may be transferred abroad, to countries/organizations outside the European Union guaranteeing a level of personal data protection deemed adequate by the European Commission by its own decision or, otherwise, on the basis of other appropriate safeguards, such as the Standard Contractual Clauses adopted by the European Commission or the Data Subject's consent. The Data Subject is entitled to obtain a copy of any appropriate safeguards, as well as the list of countries/organizations to which the data has been transferred by writing to [privacy@staff.aruba.it](mailto:privacy@staff.aruba.it).



## HOW LONG WE RETAIN THE DATA SUBJECT'S DATA

The Data are stored in a form which enables the Data Subject to be identified for no longer than is necessary for the collection purposes, given the laws covering the activities and sectors in which the Data Controller operates.

The Data necessary to comply with tax and accounting obligations are retained for 10 years from the termination of the contract (art. 2220 of the Civil Code).

The Data related to unpaid or canceled or unfinished order requests are retained for 3 months.

Logs are stored for a maximum period of 12 months from their generation.

The contact Personal data are processed for promotional activities for up to 24 months from the termination of the contract, unless prior consent is revoked by the data subject.

Contact details are processed to send commercial offers in line with the choices of the data subjects for up to 12 months from the date of termination of the contract, unless the data subject withdraws consent beforehand.

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Furthermore, the processed Data:

- as part of the marketing activities, are stored for this purpose for 24 months;
- for profiling purposes are kept for 12 months.

Once the periods thus established have transpired, the Data will be deleted or processed anonymously, unless further retention is necessary to comply with obligations or to comply with orders issued by Public Authorities and/or Supervisory Bodies.

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#### WHAT THE DATA SUBJECT'S RIGHTS ARE

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By contacting [privacy@staff.aruba.it](mailto:privacy@staff.aruba.it), the Data Subject shall be entitled, in the cases provided for in the Regulation, to access to the data concerning him/her, deletion of the data, correction of incorrect data, supplementation of incomplete data, limitation on processing the data, portability of the data and objection to the processing.

The Data Subject shall also have the right to lodge a complaint with the competent Italian supervisory authority (Italian Personal Data Protection Authority) or with that performing its duties and exercising its rights in the Member State where the infringement occurred, as provided for in Art. 77 of the Regulation, as well as to file appropriate legal proceedings pursuant to Arts. 78 and 79 of the Regulation.

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