

## 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”).



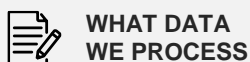
<b>Data Controller</b>	Through its pro tempore legal representative, Actalis S.p.A., with registered office in Ponte San Pietro (BG) at Via San Clemente No. 53 <a href="mailto:privacy@staff.aruba.it">privacy@staff.aruba.it</a>
<b>Data Protection Officer (DPO)</b>	<a href="mailto:dpo@staff.aruba.it">dpo@staff.aruba.it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



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

- from the Data Subject, including through remote communications methods used by the Data Controller (e.g. websites, smartphone and tablet apps, call centres, etc.);
- from third parties (e.g. parties arranging transactions for the Data Subject, business information and financial risk companies, external companies for market research purposes, etc.).

Data from public sources, such as public registers, lists, documents in the public domain (e.g. financial statements, information contained in the register of companies at the Chambers of Commerce, real estate deeds and other prejudicial data contained in public databases, such as the registration of mortgages or attachments), as well as Data extracted from sources that may be accessed publicly and generally by anyone, such as print or digital newspapers, information from telephone directories, websites of public bodies or other supervisory and regulatory authorities, will also be used.



CATEGORY OF DATA	EXAMPLES OF DATA TYPES
Personal information	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 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 information materials and to comply with 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.
<b>Management of the contractual relationship</b> 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.
<b>Defending a right in court or out of court</b> 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.
<b>Physical and Information Security</b> The Data Subject's personal data are processed to ensure network and information security, the protection of corporate assets and the security of the Aruba Group's offices 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.
<b>Fraud prevention</b> 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 <a href="mailto:privacy@staff.aruba.it">privacy@staff.aruba.it</a> .	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.
<b>Promotional activities for Services/Products similar to those purchased</b> 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 the Data Controller's legitimate interest in promoting products or services which may reasonably be of interest to the Data Subject, given the balance of rights of the latter and the Data Controller. 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.
<b>Promotional activities for Services/Products offered by Actalis</b> The Data Subject's personal data are processed in order to send, subject to specific consent, promotional communications and offers relating to the Data Controller's Services/Products through traditional methods (e.g. ordinary mail, landline calls) and/or automated methods (e.g. email, SMS, MMS, fax, pre-recorded calls).	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 use the relevant services, without this entailing detrimental consequences for the contractual relationship with the Data Controller.
<b>Promotional activities for Services/Products of the Aruba Group companies</b> The Data Subject's personal data are processed in order to send, subject to specific consent, promotional communications and offers of	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.

Services/Products of Aruba Group companies through traditional methods (e.g. ordinary mail, landline calls) and/or automated methods (e.g. email, SMS, MMS, fax, pre-recorded phone calls). If the Data Subject refuses to give his or her consent, it will not be possible to use the relevant services, without this entailing detrimental consequences for the contractual relationship with the Data Controller.

**Profiling**

The Data Subject's personal data are processed, 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 use the relevant services, without this entailing detrimental consequences for the contractual relationship with the Data Controller.



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

CATEGORIES OF RECIPIENTS	PURPOSE
Companies belonging to the Aruba S.p.A. Group ("Aruba Group")	Fulfilment 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
Credit and electronic payment institutions, banks/post offices	Managing deposits, payments, reimbursements associated with the contractual service
External professionals/consultants and consulting firms	Fulfilment of legal requirements, exercising rights, protecting contractual rights, credit recovery
Financial Administration, Public Agencies, Legal Authorities, Supervisory and Oversight Authorities	Fulfilment of legal requirements, defence 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 authorised 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 will be held 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. Once the periods thus established have lapsed, the Data will be deleted or processed anonymously, unless further retention is necessary to comply with obligations (e.g. tax and accounting obligations) remaining even after termination of the contract (Art. 2220 of the Civil Code) or to comply with orders issued by Public Authorities and/or Supervisory Bodies.



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

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.