

PRIVACY NOTICE ON THE PROCESSING OF USERS' PERSONAL DATA

PURSUANT TO REGULATION (EU) 2016/679 ("GDPR")

Data Controller

The Data Controller is Datlas S.p.A., with its registered office at Viale della Resistenza No. 47, 42018 San Martino in Rio (RE), Italy, VAT No. 02628600351.

Contact Details

Telephone: +39 0265535411

Email: info@datlasgroup.com

Certified email (PEC): datlas@pec.datlasgroup.com

Data Protection Officer

In view of the processing activities carried out, the Data Controller has deemed it necessary to appoint a Data Protection Officer, who may be contacted at the following email address: dpo@datlasgroup.com.

Categories of Data, Purposes and Legal Bases of Processing

- 1) The data provided when completing the form will be processed in order to manage and respond to the data subject's request. Where the request relates to the potential establishment of a contractual relationship, the legal basis is the taking of steps at the request of the data subject prior to entering into a contract, pursuant to Article 6(1)(b) of the GDPR. In all other cases, processing is based on the Data Controller's legitimate interest in managing and responding to requests received, pursuant to Article 6(1)(f) of the GDPR.
- 2) Subject to your consent, the data you provide when completing the form will be processed for marketing purposes, including, by way of example, the sending of promotional and commercial communications relating to the services/products offered by the Company, using automated contact methods (such as SMS, MMS and email) and traditional methods (such as telephone calls made by an operator and postal mail), as well as conducting market research and statistical analyses. The legal basis is your consent pursuant to Article 6(1)(a) of the GDPR. Consent is optional and may be withdrawn at any time, without affecting the lawfulness of processing carried out prior to withdrawal.
- 3) Subject to the data subject's consent, the data provided by completing the form and information relating to browsing the Data Controller's websites, such as pages viewed, interactions and clicks, may be used to create a profile of the data subject's interests and preferences. This activity is intended to personalize promotional and commercial communications and to offer content, products, services or initiatives deemed more relevant. The legal basis for processing is the data subject's consent pursuant to Article 6(1)(a) of the GDPR. Consent is optional and may be withdrawn at any time, without affecting the lawfulness of processing carried out prior to withdrawal.

Nature of Data Provision

Providing the data marked as mandatory is necessary to enable the Data Controller to manage and respond to the request. Failure to provide such data will make it impossible to process the request.

The provision of data and consent for marketing purposes are, by contrast, optional. Refusal to consent does not affect the ability to submit a request through the contact form.

Consent to the processing of data for profiling purposes is optional. Refusal to consent, or subsequent withdrawal of consent, does not affect the ability to submit requests through the contact form or any consent given to receive non-personalized marketing communications.

Please do not include information belonging to the special categories of personal data referred to in Article 9 of the GDPR in the free-text field. Any such data that is not necessary to handle the request will be deleted.

Recipients of Data

Your data may be disclosed to entities acting as independent data controllers (including, by way of example, supervisory and regulatory authorities and any public body legally entitled to request the data), or processed on behalf of the Company by entities appointed as Data Processors and provided with appropriate operational instructions. These entities primarily fall into the following categories:

- a) the Company's associated, subsidiary and affiliated companies;
- b) companies carrying out statistical and/or market research and studies;
- c) companies providing marketing services.

The data may be processed by employees of the business functions responsible for pursuing the purposes outlined above, who have been expressly authorized to process the data and have received appropriate operational instructions.

Transfers of Personal Data Outside the European Economic Area

Personal data may be transferred to countries outside the European Economic Area only in compliance with Articles 44 et seq. of the GDPR. In particular, transfers may take place on the basis of an adequacy decision by the European Commission, including, where applicable, the recipient's participation in the EU-US Data Privacy Framework, or through the adoption of Standard Contractual Clauses approved by the European Commission and any additional safeguards deemed necessary.

The data subject may contact the Data Controller or the DPO to obtain further information about transfers made, the applicable safeguards and how to obtain a copy of them.

Data Retention

Data processed to manage and respond to requests will be retained for 180 days from the closure of the request, unless further retention is necessary in connection with the establishment of a contractual relationship, compliance with legal obligations or the protection of the Data Controller's rights.

Data processed for marketing purposes will be retained until consent is withdrawn and, in any event, for no longer than two years from collection or the last meaningful contact with the data subject.

Data processed for profiling purposes will be retained until consent is withdrawn and, in any event, for no longer than twelve months from collection, the last update of the profile or the data subject's last meaningful interaction, unless a shorter retention period is provided for the Tracking Tools used.

Data Subject Rights

By contacting the Company via email at dpo@datlasgroup.com, data subjects may request access to their personal data, erasure of their data, rectification of inaccurate data, completion of incomplete data, restriction of processing in the cases set out in Article 18 of the GDPR, and object to processing where it is based on the Data Controller's legitimate interest.

In addition, where processing is based on consent or a contract and is carried out by automated means, data subjects have the right to receive their data in a structured, commonly used and machine-readable format and, where technically feasible, to transmit such data to another controller without hindrance.

Data subjects have the right to lodge a complaint with the competent supervisory authority in the Member State of their habitual residence, place of work or the Member State in which the alleged infringement occurred.

The data subject has the right to withdraw consent given for marketing purposes at any time and to object to the processing of data for those same purposes. Data subjects who prefer to be contacted for these purposes exclusively through traditional methods may object solely to receiving communications through automated methods.

☐ **I declare that I have received and read the Privacy Notice.**

Having read the Privacy Notice above, and being aware that my consent is entirely optional and may be withdrawn at any time, I consent to the processing of my data by the Company for the purpose of sending promotional and commercial communications relating to the services/products offered by the Company, using automated contact methods (such as SMS, MMS and email) and traditional methods (such as telephone calls made by an operator and postal mail), and for conducting market research and statistical analyses.

☐ **I consent**

☐ **I do not consent**

Having read the Privacy Notice, I consent to the processing of the data provided and information relating to my browsing and interactions with the Data Controller's websites, also collected through Tracking Tools, in order to create a profile of my interests and preferences and receive personalized promotional and commercial communications.

☐ **I consent**

☐ **I do not consent**