

PRIVACY NOTICE Information pursuant to Articles 13 - 14 of EU Regulation No. 2016/679 We are SOCIETA' COOPERATIVA DELTA SERVICES, VAT number 01968600021, with registered office at Via Delleani, 37/d - 13900 Biella (BI), and, pursuant to Articles 13 - 14 of EU Regulation No. 2016/679 (hereinafter "GDPR 2016/679"), which provides provisions for the protection of individuals and other subjects regarding the processing of personal data, we inform you that your personal data provided to us will be processed in compliance with data protection regulations and confidentiality obligations. Here's what you need to know:

1. **WHO PROCESSES YOUR DATA** Data Controller The Data Controller is SOCIETA' COOPERATIVA DELTA SERVICES, VAT number 01968600021, with registered office at Via Delleani, 37/d - 13900 Biella (BI).
2. **WHY WE PROCESS YOUR DATA** Purposes of data processing "Processing of personal data" means any operation or set of operations performed with or without the aid of automated processes and applied to personal data or sets of personal data, including collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure or destruction. The processing of your personal data is intended to conclude, execute, and manage the contract for the provision of services purchased from SOCIETA' COOPERATIVA DELTA SERVICES, under the "Offer for the use of the ALDEBARAN PLEIN AIR cloud platform," which is fully referenced, and thus allow you access to and use of the cloud computing platform named "Aldebaran Plein Air" operational at www.aldebaranpleinair.it.
3. **WHAT DATA WE PROCESS** Types of data processed For the contractual purposes mentioned in point 2 above, we process the following personal data: company name, address, city, postal code, VAT number, telephone number, mobile phone number, fax number, ordinary email address, contact person, bank details, tax code, SDI code, certified email address; Administrator's access credentials to the computer platform named "Aldebaran Plein Air": username and password, which is changed by the Administrator upon first login. The operational platform "Aldebaran Plein Air" may automatically process, without your consent, the following technical personal data: IP address (Internet Protocol), date and time of connection, physical address of the device from which the connection is made, resource request notation addresses, number of clicks made. Cookies are also automatically processed, and their description can be found in the "Cookie Policy" available at www.aldebaranpleinair.it.
4. **PROVIDING OR REFUSING TO PROVIDE YOUR PERSONAL DATA** Provision of data and refusal to provide data The provision of your personal data is strictly necessary for the performance of the activities described in point 2. By declaring that you have read the information on the processing of your personal data, you give your consent to the processing. Your refusal to provide your personal data would make it impossible to carry out the activities described in point 2.
5. **CONDITIONS UNDER WHICH WE PROCESS YOUR PERSONAL DATA** Legal basis for processing and legitimate interest The legal basis – the condition of lawfulness under which we

lawfully process your personal data is constituted (under art. 6 para. 1 letter b) GDPR 2016/679) by the fulfillment of pre-contractual and contractual measures adopted at your request, aimed at enabling us to conclude, execute, and manage the contract for the provision of services purchased from SOCIETA' COOPERATIVA DELTA SERVICES, under the "Offer for the use of the ALDEBARAN PLEIN AIR cloud platform," which is fully referenced, and thus allow you access to and use of the cloud computing platform named "Aldebaran Plein Air" operational at www.aldebaranpleinair.it. The legal basis – the condition of lawfulness under which we lawfully process your technical personal data and necessary Cookies is constituted (under art. 6 para. 1 letter b) GDPR 2016/679) by the fulfillment of pre-contractual and contractual measures adopted at your request, aimed at enabling you to benefit from the services purchased from SOCIETA' COOPERATIVA DELTA SERVICES, under the "Offer for the use of the ALDEBARAN PLEIN AIR cloud platform," which is fully referenced, and thus allow you access to and use of the cloud computing platform named "Aldebaran Plein Air" operational at www.aldebaranpleinair.it (art. 6 para. 1 letter a) GDPR 2016/679). The legal basis – the condition of lawfulness under which we lawfully process unnecessary Cookies is constituted by your express consent for the purposes selected by you (under art. 6 para. 1 letter a) GDPR 2016/679). The legal basis – the condition of lawfulness under which we, without your express consent, may use the personal data you provide to us, is constituted by our legitimate interest as Data Controller in exercising our rights, such as the right to defense in legal proceedings (art. 6 para. 1 letter f) GDPR 2016/679). The legal basis – the condition of lawfulness under which we, without your express consent, may use the personal data you provide to us, is constituted by the need to fulfill obligations under the law, regulations, EU legislation, or an order from the Authority, to which we are subject as Data Controller (art. 6 para. 1 letter c) GDPR 2016/679).

6. **HOW YOUR DATA ARE PROCESSED AND WHERE THEY ARE STORED** Methods of processing, location, and storage of data We process your personal data through collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, erasure, or destruction of data (art. 4 no. 2 GDPR). Processing will be carried out in automated and/or manual form, by specifically appointed subjects and in compliance with what is provided for by Articles 29 and 32 GDPR 2016/679. The storage period depends on the type of data processed; after the storage period, we dispose of the deletion of your personal data. To comply with the principles of lawfulness, purpose limitation, and data minimization (art. 5 GDPR 2016/679), we will retain your personal data for the period necessary to achieve the purposes for which they are collected and processed and, in any case, not beyond the following timeframes: a) Navigation data is deleted following their processing at the end of the browsing session and, in any case, within a maximum of 7 days; b) Cookies are deleted according to their type and category, as indicated in the "Cookie Policy." c) The personal data you provide to us to fulfill the contractual purposes indicated in point 2 are retained for 10 years from the date of termination of the contract; The location of the processing of your personal data is our headquarters, or any other location where we and you are geolocated.
7. **TO WHOM WE COMMUNICATE YOUR DATA** Communication of data Your personal data provided to us will be communicated exclusively to qualified third parties and only where

required by law or necessary for the performance of the requested services, with a guarantee of your rights and in compliance with EU Regulation No. 2016/679 and the Privacy Code, duly appointed as data processors or authorized persons. Your personal data may be communicated to: a) IT service providers necessary for the operation of the operational platform, cloud system managers; b) Providers of other services, acting as data processors; c) Authorized and/or appointed subjects; The complete list of data processors will be provided to you upon written request sent to the email address: info@delta-services.org We may communicate, without consent, your personal data provided to us to Supervisory Authorities, Judicial Authorities, and those subjects to whom communication is mandatory by law for the performance of said purposes. These subjects will process the data as autonomous data controllers (under art. 6 letters b) and c) GDPR). In particular, according to the "Offer for the use of the ALDEBARAN PLEIN AIR cloud platform" signed between the parties, your personal data provided to us will be communicated to the Portale Alloggiati Web and to the regional ISTAT Portal.

8. DISCLOSURE OF YOUR DATA

Data disclosure

Your personal data that you provide to us is not subject to disclosure.

9. WHERE YOUR DATA IS PROCESSED

Transfer of data abroad

Your personal data is stored and kept on electronic databases located in countries within the European Economic Area (EEA) that guarantee an adequate level of data protection.

Your personal data is not transferred to countries outside the European Union or the European Economic Area (so-called Third Countries).

However, your personal data provided by you, for the purpose of using cloud services by SOCIETA' COOPERATIVA DELTA SERVICES through the IT platform named "Aldebaran Plein Air" operational in the cloud at the address www.aldebaranpleinair.it, may also be transferred to countries outside the European Union or the European Economic Area (so-called Third Countries) only if recognized by the European Commission as having an adequate level of personal data protection and provided that the exercise of your rights is always ensured. The data controller selects cloud service providers that offer adequate guarantees (Article 46 GDPR 2016/679). You declare that you have been informed of the presence of technical and organizational measures aimed at mitigating potential risks (Article 49, paragraph 1, letter a) GDPR 2016/679) and you consent to the transfer of your personal data to a third country outside the European Union, expressly derogating from the adequacy criterion. For further information, you can send a written request to the data controller at the email address info@delta-services.org.

10. YOUR RIGHTS AS A DATA SUBJECT

Rights of the data subject

At any time, you can exercise, in accordance with Articles 15 to 22 of EU Regulation No. 2016/679, the right to:

- a) request confirmation of the existence of your personal data;
- b) obtain information about the purposes of the processing, the categories of personal data

involved, the recipients or categories of recipients to whom your personal data have been or will be disclosed, and, where possible, the envisaged period of retention;

c) obtain rectification or erasure of your data;

d) obtain restriction of processing;

e) receive the personal data concerning you, which you have provided to a controller, in a structured, commonly used, and machine-readable format and have the right to transmit those data to another controller without hindrance;

f) object to the processing at any time, including processing for direct marketing purposes;

g) object to decisions based solely on automated processing, including profiling.

h) request access to your personal data and rectification or erasure of such data or restriction of processing concerning the data subject, or to object to processing, as well as the right to data portability;

i) withdraw your consent at any time without affecting the lawfulness of processing based on consent before its withdrawal;

j) lodge a complaint with a supervisory authority;

k) lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali), following the procedures and instructions published on the official website of the Authority at www.garanteprivacy.it.

11.COMPLAINT

Complaint to the Italian Data Protection Authority

Without prejudice to any other administrative or judicial remedy, if you believe that your rights have been violated, you have the right to lodge a complaint with the Italian Data Protection Authority through the methods indicated on the website www.garanteprivacy.it, or to lodge a complaint with a supervisory authority in the Member State where you habitually reside or work, or where the alleged violation occurred.

12.HOW WE PROTECT YOUR DATA

Security measures

We have adopted and documented specific and adequate technical and organizational security measures (Article 32 of EU Regulation No. 2016/679) aimed at minimizing the risk of destruction, loss, unauthorized access, or unlawful processing of your data.

13.CATEGORIES OF DATA WE PROCESS

Special categories of personal data

We do not process special categories of personal data on your behalf, such as data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, nor do we process genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, or data concerning a person's sex life or sexual orientation (Articles 9 and 10 of EU Regulation No. 2016/679).

Please refrain from entering any special data in any field; such data will be immediately deleted without being recorded.

14.AUTOMATED DECISION-MAKING AND PROFILING NOT APPLIED

We do not apply any automated decision-making processes, including profiling (Articles 22,

paragraphs 1 and 4 of EU Regulation No. 2016/679).

You can exercise your rights by submitting a written request to SOCIETA' COOPERATIVA DELTA SERVICES, located at Via Delleani, 37/d - 13900 Biella (BI), Italy, or by PEC at the certified email address: deltaservices@pec.it.

15.REFERENCE CLAUSE

For matters not expressly indicated in this privacy information, reference is made to the "Offer for the use of the ALDEBARAN PLEIN AIR cloud platform," signed between the parties.

Data Controller - SOCIETA' COOPERATIVA DELTA SERVICES

Information updated as of May 29, 2024