

Customer information to fulfill pre-contractual, contractual and fiscal obligations

APYROS S.r.l. Unipersonale, with registered office in Via Meravigli n. 16, postcode 20123, Milan and Operating Office in Via Sandro Totti n. 2, postcode 60131 Ancona (afterwards "Owner") - as data controller – pursuant to art. 13 Legislative Decree 30.6.2003 n. 196 (afterwards "Privacy Code") and art. 13 EU Regulation n. 2016/679 (afterwards "GDPR") – informs that your personal data will be processed through the following procedures and purposes.

1. Object of Treatment

The Owner processes personal and identification data (e.g. name, surname, company name, address, telephone number, e-mail, bank and payment coordinates – afterwards "personal data" or even "data") you provided for the finalization of contracts regarding the Owner services.

2. Purposes of treatment

Your personal data are processed:

A) without your express consent (art. 24 lett. a), b), c) Privacy Code and art. 6 lett. b), e) GDPR), for the following service purposes:

- Finalize the contracts regarding the Owner services;
- Fulfill the pre-contractual, contractual and fiscal obligations coming from existing relationship with you;
- Fulfill the obligations provided for by law, by regulation, by community legislation or by an Authority order (e.g. anti-money laundering);
- Exercise the rights of the Owner, for example the right to defense in Court.

If you are already our Customer, we may send you commercial communications related to the Owner services and products similar to those you have already used, unless you dissent (art. 130 c. 4 Privacy Code).

3. Methods of treatment

The processing of your data is carried out through the operations indicated in art. 4 Privacy Code and art. 4 n. 2) GDPR, more precisely: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, deleting and destruction of data. Your personal data are subjected to both paper and electronic and/or automated processing.

The Owner will process the data for the necessary time to fulfill the above purposes and, anyhow, for no more than 10 years from the termination of the relationship for the service purposes.

4. Access to data

Your data may be accessible for the purposes in art. 2.A):

- To employees and collaborators of Owner in Italy, as persons in charge and/or internal managers of the processing and/or system administrators;
- To third-party companies or other subjects (for example, credit institutions, professional firms, consultants..) carrying out outsourced activities on behalf of the Owner, as external data processors.

5. Communication of data

Without the need for express consent (ex art. 24 lett. a), b), d) Privacy Code and art. 6 lett. b) and c) GDPR), the Owner may communicate your data for the purposes referred to in art. 2.A) to Supervision Bodies (such as IVASS), Judicial Authorities, Insurance Companies for the provision of insurance services, as well as to persons to whom the communication is mandatory by law for the fulfillment of said purposes. These persons will process the data as independent data controllers.

Your data will not be disseminated.

6. Data transfer

Personal data are stored on servers located in the Headquarter, in the European Union. Anyway, it remains understood that the Owner, if necessary, will have the right to move the servers even outside EU. In this case, the Owner ensures that the transfer of data outside EU will take place according to the applicable legal provisions, subject to the stipulation of the standard contractual clauses provided for by the European Commission.

7. Nature of the provision of data and consequences of refusal to answer

The provision of data for the purposes referred to in art. 2.A) is mandatory. Without them, we will not be able to guarantee the services in art. 2.A).

8. Rights of the interested party

As an interested party, you have the rights referred to in art. 7 of Privacy Code and art. 15 GDPR, precisely the rights to:

- i. obtain confirmation of the existence of your personal data, even if not yet registered, and their communication in an intelligible form;
- ii. obtain the indication about: a) origin of personal data; b) purposes and methods of the processing; c) applied logic in case of processing through electronic instruments; d) identity of the owner, manager and appointed representative according to art. 5, paragraph 2 Privacy Code and art. 3, paragraph 1, GDPR; e) person or categories of persons to whom the personal data may be communicated or who can learn about them as appointed representative in the State, managers or agents;
- iii. obtain: a) updating, rectification or – if interested – integration of data; b) cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those that do not need to be kept for the purposes the data were collected for or subsequently processed; c) attestation that the operations referred to in letters a) and b) have been brought to the attention – even for their content - of those to whom the data have been communicated or disseminated, except the case in which this fulfilment proves impossible or implies the use of evidently disproportionate means if compared to the protected right;

iv. oppose, in whole or in part: a) for legitimate reasons to the processing of your personal data, even if pertinent to the purpose of collection; b) to processing of your personal data aiming at sending advertising or direct sales material or carrying out market research or commercial communication, through automated call systems without an operator by e-mail and/or traditional marketing methods by telephone and/or paper mail. The right of opposition of the interested party, explained in above point b), for direct marketing purposes through automated methods extends to traditional ones and, anyway, the possibility to exercise the right of opposition, even partially, remains. Therefore, the interested party can decide to receive only communications using traditional methods or only automated communications or neither of the two.

Where applicable, you also have the rights referred to in art. 15-21 GDPR (Right of rectification, right to be forgotten, right to limitation of processing, right to data portability, right of opposition), as well as the right of complaint to the Guarantor Authority.

9. How to exercise rights

You can exercise your rights at any time by sending:

- A registered letter with return receipt to Apyros S.r.l.;
- A PEC to the address: apyros@pec.it;
- An e-mail to the address: francesca.pergolesi@apyros.it.

10. Owner, manager and agents

The data Controller is Apyros S.r.l. Unipersonale with registered office in Via Meravigli n. 16, post code 20123, Milano (MI).

The updated list of data processors and persons in charge of processing is kept at the Headquarter of the data Controller.