

CUSTOMER PRIVACY NOTICE

ON PERSONAL DATA PROTECTION

in compliance with Articles 13 and 14 of EU Regulation 2016/679

ver. 1.3 of 15/10/2024

GENERAL INFORMATION

With this notice, Entaksi Solutions SpA (hereinafter Entaksi), headquartered at Via La Piana n° 76, Frazione Pontepetri, 51028, San Marcello Piteglio (PT), which acts as Data Controller, intends to inform data subjects about the purposes and methods of processing the personal data collected, their scope of communication and dissemination, as well as the nature of their provision.

CONTACT INFORMATION AND DATA PROTECTION OFFICERS

The Data Controller is Entaksi Solutions SpA.

The updated list of data processors and authorized persons for data processing is kept at the Data Controller's headquarters.

In the event that the data subject wishes to exercise their rights or submit any requests, can send an email to privacy@entaksi.eu.

The data subject can also contact the Data Protection Officer at any time at the e-mail address dpo@entaksi.eu.

DATA COLLECTION

The data processed by Entaksi as the Data Controller may be collected through the following channels:

- Directly from the data subject, using tools provided by Entaksi (SaaS services, web applications, email, support services, etc.);
- From third parties operating under formal authorization from Entaksi.

TYPES OF DATA

The data processed by Entaksi as the data controller may include:

- a) personal data obtained from service subscription contracts and product supply contracts, such as: name, surname, date and place of birth, residential address, tax code, identification documents details, photo and video identification, as well as administrative, accounting, fiscal, commercial, and legal data.
- b) contact data uniquely associated with the data subject, such as telephone or electronic contact information, specifically email and phone number;
- c) IP address of origin, logs associated with operations performed on systems provided by Entaksi or by third parties authorized by Entaksi;
- d) any other personal data contained in the contract and possible attachments.

PURPOSE OF THE PROCESSING

The personal data are processed for the following purposes:

- a) for preliminary informational activities, such as requests to the Data Controller for informational material, contacts, and subscriptions to services. The provision of this data is optional; in the event of an objection from the data subject, the Data Controller will not proceed with the requested services and will delete the data as stated in the "Retention Period".
- b) to conclude contracts with the data controller, to comply with pre-contractual, contractual and tax obligations arising from the relationship with the data controller, to manage the activities expressly outlined in the contract and to comply with legal obligations, by European Union regulations, by orders of Authorities. This purpose does not require explicit consent as provided in Article 6, paragraphs b) and e) of EU Regulation 679/2016.
- c) to exercise the rights of the Data Controller in legal proceedings, should any unlawful behavior by the data subject be identified. This purpose is pursued pursuant to Article 6, paragraph (f) of EU Regulation 679/2016.
- d) sending information messages, commercial and promotional communications related to the data controller's own activities and



services, through automatic means, such as e-mail and sms, as well as traditional means, such as telephone contact with operator, in full compliance with the principles of lawfulness and fairness and the provisions of the law. This purpose requires explicit consent as required by art. 7 of EU Regulation 679/2016.

All the aforementioned data collected are processed and used in full compliance with the principle of correctness and lawfulness and the provisions of law, and only for the purposes of contract management for services and products provided by Entaksi. The data will therefore be processed for the purpose of contractual administration and to fulfill any legal obligations and defensive purposes to which the data controller may be subject, except for the contact details of the data subject who signs the contract, which may be used for the purpose described in point b) as set out in the next paragraph.

There is no automated decision-making process in the processing of personal data.

LEGAL BASIS FOR PROCESSING

The provision of data is mandatory for the requirements necessary for purposes a) and b); it does not require explicit consent, and any refusal by the data subject will result in the data controller's inability to proceed with the establishment of the relationship and its proper execution.

For purpose d), the provision is optional, and any refusal will prevent the controller from informing the data subject about its promotional and commercial activities.

In cases where an individual provides data related to third parties, assume the role of an independent controller with the corresponding obligations and responsibilities defined by the regulations. Responsibility arising from such processing releases Entaksi from liability in the event of disputes from legitimate controllers.

MODALITIES OF PROCESSING

The processing of data is carried out through IT procedures or other electronic means, as well as paper-based support, by individuals, whether internal or external, who are specifically assigned to this task and are committed to confidentiality. The data is stored in paper and electronic archives, with full assurance of the security measures required by law.

Except for navigation data, which is necessary to carry out IT and electronic protocols, the provision of personal data by users is free and optional. However, failure to provide such data will result in the inability to process the requests submitted or that the user intends to submit.

Entaksi entrusts the digital identification process of the user, necessary for the provision of qualified trust services, to the certified provider Onfido SaS (hereinafter referred to as "Onfido"), which operates as an external Data Processor solely for this activity. More information on the processing methods by Onfido can be found at <https://onfido.com/privacy/>.

RETENTION PERIODS

The data related to the Purpose specified in the previous paragraph "Purposes of Processing – b)" will be retained for the time necessary to fulfill the administrative, accounting, and tax purposes related to the established relationship and also as required by law, in any case not exceeding the deadlines established by obligations arising from compliance with the terminated contract. The same criterion applies to the purpose specified in the previous paragraph 'Purposes of Processing – a)'; if the contract is finalized, it falls under purpose b), while if there is an objection during the initial contact, the data will be deleted within 6 months from the date of provision.

Regarding any consent for the purpose specified in the previous paragraph "Purposes of Processing – b)", the data will be retained until the data subject revokes their consent to receive commercial and promotional communications, and in any case, no longer than 24 months after the termination of the contract.

RIGHTS OF THE DATA SUBJECT

The data subject can at any time exercise his or her data protection rights pursuant to articles 15-22 of the GDPR 2016/679.

Right of the data subject:

1. Access Right: data subject has the right to obtain from the data controller confirmation that personal data concerning him or her are being processed or not and in this case, to obtain access to personal data and information relating to: purposes of processing; the categories of personal data concerned; the recipients or categories of recipients to whom the personal data have been or will be communicated; retention period of personal data provided or the criteria used to determine such period; where the data are not collected from the data subject, all available information on their origin.
2. Rectification Right: data subject has the right to obtain from the data controller the rectification of the inaccurate personal data concerning him or her without undue delay. Taking into account the purposes of the processing, the data subject has the right to obtain the integration of incomplete personal data, including by providing an additional statement.
3. Erasure Right: data subject has the right to obtain from the data controller the erasure of the personal data concerning

him or her without undue delay and the data controller has the obligation to delete personal data without undue delay in accordance with the terms prescribed by Article 17 of EU Regulation 679/2016.

4. Right to restriction of processing: data subject has the right to obtain from the data controller restriction of processing in accordance with the terms prescribed by Article 18 of EU Regulation 679/2016.
5. Right to data portability: data subject has the right to receive in a structured format, commonly used and machine-readable format of personal data concerning him or her provided to a data controller and has the right to transmit those data to another controller without hindrance by the controller according to the terms prescribed by art. 20 of EU Regulation 679/2016.
6. Right to object: data subject has the right to object at any time to the processing, according to the terms prescribed by art. 21 of EU Regulation 679/2016.

The data subject also has the right to lodge a complaint with the supervisory authority if they believe that the present processing violates EU Regulation 679/2016.

COMMUNICATION OF DATA

The collected data will not be subject to unauthorized disclosure or dissemination. Communication to third parties, other than the Data Controller, internal and external Data Processors, and designated and appointed individuals, is provided to public entities for legal compliance, as well as, where necessary for the pursuit of the stated purposes and in any case in their limits, to third parties and companies such as legal and industry consultants, debt collection agencies, and contractual consulting firms, as well as third-party providers of technical and IT support engaged in the proper and regular pursuit of the described purposes, and to the auditing company for the assigned control tasks.

In any case, the processing by third parties must take place in accordance with correctness and in compliance with the provisions of law in force.

DATA LOCATION

The data is stored by Entaksi in archives located within countries of the European Union. No transfers are planned to countries or organizations outside the EU.

VIOLATION

In case of personal data violation to allow the data controller to notify the competent supervisory authority as required by Article 33 of the GDPR, Entaksi, as Data Controller, commits to inform the Client, in its capacity as Data Controller (or Processor) without undue delay after becoming aware of the violation.

DATA TRANSFER AND PORTABILITY

The Data Controller does not transfer the personal data of data subjects to third countries or other organisations.

The data subject has the right to receive in structured, commonly used and machine-readable format, the personal data concerning him or her provided to the Data Controller, and has the right to transmit such data to another data controller without hindrance. Data subject has the right to obtain the direct transmission of personal data from one controller to another, if technically feasible.

CONSENT TO THE PROCESSING PERSONAL DATA

According to art. 7 of EU Regulation 679/2016, the interested party, having carefully reviewed the privacy notice along with the purposes and methods of data processing, declares that the information provided regarding the processing has been clearly and accurately understood with specific reference to the processing of data for the purposes outlined in point b) of the paragraph "Purposes of processing", for which an explicit optional consent is required.