

Policy pursuant to Article 13 of Regulation (EU) no. 2016/679 ("GDPR")

Aruba S.p.a. (hereinafter "Aruba") protects the confidentiality of personal data and guarantees its necessary protection against any event that may put it at risk of violation.

As provided for by European Union Regulation No. 2016/679 (hereinafter "GDPR") and Article 13 in particular, please find below the information that we are required by law to provide to the user ("Data Subject") relating to the processing of their personal data.

SECTION I

Who we are and what data we process (Article 13, paragraph 1 (a), Article 15 (b) GDPR)

Aruba S.p.A., represented by its pro tempore legal representative, with registered offices at Ponte San Pietro (BG), Via San Clemente, 53, acts as the Data Controller and may be contacted at privacy@staff.aruba.it; said Data Controller collects and/or receives information regarding the Data Subject, such as:

Category of data	Examples of types of data
Contact details	First name, last name, street address, nationality, province and municipality of residence, landline and/or mobile phone number, fax, email address(es)
Internet traffic data	Logs, originating IP address

The Data Controller has appointed a Data Protection Officer (DPO) who may be contacted for any information and requests by email: dpo@staff.aruba.it or Telephone: +39 0575/0505

For any information or requests, the Data Subject may contact the email address, privacy@staff.aruba.it, Telephone +39 0575/0505.

SECTION II

Why we need your data (Art. 13, paragraph 1 GDPR)

The data is used by the Data Controller to fulfill requests for commercial information, to manage and execute the contact requests forwarded by the Data Subject, to send promotional information and to fulfill legal and regulatory obligations required of the Data Controller in accordance with the activities performed. In no case will Aruba resell any of your personal information to third parties nor use it for any purpose not stated.

In particular, the Data Subject's personal data shall be processed for **contact requests and/or informational material and for business promotion purposes on the Services/Products marketed by the Data Controller**, to carry out preliminary and subsequent activities in order to manage information and contact requests and/or to send informational material, as well as for market research surveys with regard to the Services/Products that the Data Controller offers and for the fulfillment of any other obligations arising therefrom.

The legal basis for this processing is the consent granted by the Data Subject prior to the processing itself, which may be withdrawn by the Data Subject at any time (see Section III) and compliance with legal obligations.

This processing may occur using automated and/or manual methods: email; sms; telephone contact and may occur:

1. if the Data Subject has not withdrawn consent for the use of data;
2. if processing is undertaken through contact with a telephone operator, and the Data Subject is not listed in the do not call registry as per Italian Presidential Decree no. 178/2010, as subsequently amended and modified;

Communication to third parties and categories of recipients (Article 13, paragraph 1 GDPR)

Your personal data is communicated mainly to third parties and/or recipients whose activity is necessary to perform the activities relating to the contract established, and to meet certain legal requirements, such as:

Categories of recipients	Purposes
Companies belonging to the Aruba S.p.A. Group ("Aruba Group")	Fulfillment of administrative requirements, and those connected with the service
Third party providers and companies belonging to the Aruba S.p.A. Group*	Provision of services related to the requested service
External professionals/consultants and consulting firms	Fulfillment of legal requirements, exercise of rights, protection of rights

* The Controller requires its own third party providers and Data Processors to adhere to security measures that are equal to those adopted for you by restricting the Data Processor's scope of action to processing directly related to the requested service.

The Data Controller will not transfer your personal data to countries where the GDPR is not applicable (countries outside the EU) except where specifically indicated otherwise, in which case you will be first notified, and if necessary asked for your consent.

The legal basis for such processing is to provide the services relating to the established contract, in accordance with legal requirements and the legitimate interest of Aruba S.p.a. to carry out the processing necessary for these purposes.

SECTION III

What happens when the Data Subject does not provide his or her identification information as needed to perform the requested service, for the promotional and commercial information regarding Services/Products offered by the Data Controller? (Article 13, paragraph 2 (e) GDPR)

The collection and processing of your personal data is necessary for fulfilling the services requested. Should the Data Subject not provide personal data as expressly required in the order form, the Data Controller will not be able to carry out the processing associated with managing the requested services, or fulfill the operations resulting therefrom.

In the event the Data Subject has given consent and later withdraws it or objects to processing, his or her data will no longer be processed for these activities.

How we process your data (Article 32, GDPR)

The Controller makes use of appropriate security measures to preserve the confidentiality, integrity and availability of the Data Subject's personal data, and requires the same security measures from third-party providers and Processors.

Where we process your data

Your data is stored in hard copy, electronic and remote archives located in countries where the GDPR is applicable (EU countries).

How long is your data stored? (Article 13, paragraph 2 (a) GDPR)

Unless you explicitly express your desire to remove it, your personal data will be stored until required for the due purposes for which it was collected.

In particular, it will be stored no longer than a maximum period of 12 (twelve) months, unless the provided consent has been withdrawn.

It is also important to add that, should the user forward to Aruba personal data that has not been requested or that is unnecessary for the purposes of performing the requested services, or for the performance of services strictly related thereto,

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Aruba may not be considered as the controller of such data, and will proceed with deleting it as soon as possible.

Regardless of the Data Subject's determination to remove the data, personal information will be, in any case, stored in accordance with the terms set forth in current law and/or national regulations, for the exclusive purpose of ensuring specific fulfillments.

The foregoing does not apply in cases where it is necessary to assert in court the rights arising from the request for services, in which case the Data Subject's personal data, as exclusively required for these purposes, shall be processed for the time necessary.

What are your rights? (Articles 15 – 20 GDPR)

You have the right to obtain the following from the Data Controller:

a) confirmation as to whether personal data is being processed and if so, to obtain access to personal data and the following information:

1. the purposes of the processing;
2. the categories of personal data in question;
3. the recipients or categories of recipients that have received or will receive your personal data, in particular if these recipients are in third party countries or are international organizations;
4. when possible, the anticipated storage period of your personal data or, if not possible, the criteria used to determine this period;
5. whether you have the right to ask the Data Controller to correct or delete your personal data or the limits on processing your personal data or to oppose the processing of the data;
6. the right to file a claim with a supervisory authority;
7. in the event the data is not collected from you, all of the information available regarding its source;
8. whether there is an automated decision process, including profiling, and, at least in these cases, significant information on the logic used, as well as the importance and consequences to you for this processing.
9. the suitable guarantees provided by the third party country (outside EU) or international organization to protect any transferred data

b) the right to obtain a copy of the personal data processed, provided that this right does not jeopardize the rights and freedoms of others; In the case of extra copies being requested by the Data Subject, the Data Controller may charge a reasonable fee based on administrative costs.

c) the right to have the data controller edit any incorrect personal data concerning the Data Subject without unjustified delay

d) the right to have the data controller delete personal data relating to the Data Subject without undue delay, if the grounds featured in art. 17 of the GDPR apply, which include situations in which the data is no longer necessary for processing purposes, or if it is taken as unlawful, and provided the legal conditions for this are met; and in any case if processing is not justified for any other similarly legitimate purpose;

e) the right to have the Data Controller limit processing, in the cases set forth in Art. 18 of the GDPR, for example when you have disputed correctness, for the period necessary for the Data Controller to verify the data's accuracy. The Data Subject must be notified, within an appropriate time, even when the suspension period has passed or the cause of limiting the processing has been eliminated, and therefore the limitation itself has been withdrawn;

f) the right to have the Data Controller inform the recipients who have been sent requests for any corrections or deletions or limits on the

processing implemented, except when this is impossible or would involve a disproportionate effort.

g) the right to receive personal data concerning the data subject in a structured, commonly used and machine-readable format and the right to transmit this data to another controller without hindrance from the data controller to which the personal data have been provided, in the cases set forth by Art. 20 of the GDPR, and the right to have the personal data transmitted directly from one controller to another, where technically feasible.

To obtain further information and in any case to submit your request, you must contact the Data Controller at privacy@staff.aruba.it. To guarantee that the above rights are exercised by the Data Subject Party and not by unauthorized third parties, the Data Controller may ask the former to provide further information necessary for this purpose.

How and when can you oppose the processing of your personal data? (Art. 21 GDPR)

For reasons connected with the Data Subject's particular circumstances, the latter may at any time refuse the processing of its personal data if this is justified on legitimate grounds or if it is carried out for commercial promotion purposes, by sending a request to the Data Controller at privacy@staff.aruba.it.

You have the right to have your own personal data deleted if the Data Controller has no legitimate reason prevailing over such request, and in any case, where you have opposed the processing for business promotional activities.

Who can you file a claim with? (Art. 15 GDPR)

Except in cases of any other administrative or judicial action, the Data Subject may lodge a complaint with the competent monitoring authority in Italy (the Italian Data Protection Authority) or to the agency that performs this role and exercises the corresponding powers in the Member State in which violation of the GDPR has occurred.

Any updates to this information shall be communicated in a timely manner and through suitable means, and will be notified to you if the Data Controller processes your data for purposes other than those outlined in this notice prior to proceeding and after you have given your consent, if necessary.
