

INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO THE EUROPEAN PRIVACY REGULATION UE/2016/679 (GDPR)



Dear Customer,

In compliance with the obligations provided for by the European Data Protection Regulation UE/2016/679 (GDPR), we hereby inform you that "AJA Europe S.r.l.", with registered office in via Casetta Mattei 206, 00148 - Rome (Italy), VAT and fiscal code 15506041001, telephone 06/6507541, e-mail info@acubetic.com and website www.acubetic.com, as data controller, will process the personal data concerning you that have been or may be conferred/communicated to us - by you or other subjects - during the relationship with our structure.

The processing of the data freely provided by you or otherwise collected will be carried out in compliance with the privacy regulations in force; it will be based on the principles of correctness, lawfulness and transparency and will be carried out in compliance with the principles of pertinence, completeness and non excessiveness.

Therefore, in accordance with Article 13) of the European Data Protection Regulation EU/2016/679 (GDPR), we inform you that:

1) FOR WHICH THE DATA IS PROCESSED:

The data provided by you will be processed for the following purposes

- the regular performance of institutional activities and/or those foreseen by the company's purpose
- requirements related to the establishment of contracts and orders, their execution, subsequent amendments or modifications, and all obligations envisaged for their fulfillment
- operational, organisational, administrative, fiscal, financial, insurance and accounting requirements relating to the contractual and/or pre-contractual relationship established
- the fulfilment of any type of obligation provided for by law, regulation or EU legislation
- the need to monitor the provision of products/services, the progress of relations with suppliers and the analysis and management of risks associated with the contractual relationship
- Traditional marketing activities, online marketing, web marketing and web advertising (subject to obtaining your explicit consent).

2) TREATMENT MODALITIES:

The processing will be carried out by non-automated or partially automated means and may consist of the following operations: collection, recording, organisation, storage, consultation, use, processing, modification, selection, extraction, comparison, interconnection, transmission, communication, dissemination, erasure, destruction, blocking and limitation.

The processing will be carried out both on paper and with the aid of electronic, computerised and telematic tools suitable for guaranteeing the security and confidentiality of the data themselves, in accordance with the provisions of Article 32) of the European Data Protection Regulation EU/2016/679 (GDPR) on appropriate security measures.

However, when carrying out the processing operations, all technical, IT, organisational, logistical and procedural security measures will always be adopted in order to guarantee the minimum level of data protection required by law. The above-mentioned methods used for the processing will guarantee access to the data only to the subjects specified in point 4).

3) THE LEGAL BASIS OF THE PROCESSING OPERATION:

The provision and processing of data is:

- compulsory and does not require your consent for the achievement of purposes connected with obligations provided for by laws, regulations or community rules.
- indispensable and does not require your consent for all personal data essential for the proper establishment, management and continuation of the business and/or contractual relationship.
- indispensable and requires your consent for all special categories of personal data and for all personal data relating to criminal convictions and offences essential for the proper establishment, management and continuation of the business and/or contractual relationship.
- optional and requires your explicit consent for all personal data collected for marketing purposes or purposes not directly and/or indirectly related to contractual obligations, pre-contractual obligations, legal obligations, the safeguarding of vital interests, the performance of public duties, the exercise of public authority or the pursuit of legitimate interests.

Any refusal, albeit legitimate, to provide all or part of the above data, could compromise the regular course of the relationship with our structure and in particular, for the personal data defined above as mandatory and indispensable, could make it impossible for us to carry out the normal course of business operations and the regular provision of products/services requested.richiesti.

4) CATEGORIES OF RECIPIENTS OF PERSONAL DATA:

The persons or categories of persons who may become aware of the data or to whom the data may be disclosed are as follows:

- Legal representative of the data controller
- Data Protection Officer (if appointed)
- Data Processors: Auditors, accountants, regulators, consultants and consultancy firms, freelancers, self-employed workers, technical and engineering firms, agents and representative offices, banks and insurance companies, credit recovery companies, auditors and audit firms, accountants, employment agencies, legal firms, transport and logistics companies, sub-contractors and doctors and medical practices.
- Data processors: Management, administration, secretariat, human resources, marketing, commercial, technical and information systems, A Cube Tic/AJA Group companies.
- System administrators.

Personal data may also be disclosed, but only in aggregate, anonymous form and for statistical purposes or to promote valid certifications in the Registers and/or Lists.

Personal data may also be disclosed to accreditation bodies, public authorities, police forces or other public and private subjects, but only for the purpose of fulfilling legal obligations, regulations or EU legislation.

Where the processing may also involve personal data that fall within the category of 'special categories of personal data' (i.e. data revealing racial or ethnic origin, religious, philosophical or other beliefs, political opinions, membership of parties, trade unions, associations or organisations of a religious, philosophical, political or trade-union nature, and personal data disclosing health, sex life, sexual orientation, genetic data and biometric data) or personal data relating to criminal convictions or offences, the processing is carried out within the limits indicated by specific provisions of the Privacy Guarantor and for the purposes strictly necessary for the regular performance of business activities, operations related to the provision of products/services and the fulfilment of contractual and/or legal/regulatory obligations.

In that case, the persons or categories of persons who may become aware of particular categories of personal data or personal data relating to criminal convictions or offences or to whom the data may be disclosed are as follows:

- Legal representative of the data controller
- Data Protection Officer (if appointed)
- Data Processors: Consultants and consultancy firms, auditors, examiners, regulatory bodies, self-employed professionals, accountants and accountancy firms, law firms and medical practices.
- Processors: Management, administration, secretarial, technical and information systems.
- System Administrators

Personal data may also be communicated to Public Bodies, Police Forces or other Public and Private Subjects, but exclusively for the purpose of fulfilling legal obligations, regulations or EU legislation.

The data in question will not be communicated to other parties other than those envisaged in this information notice, and the data likely to reveal the state of health of the person concerned will in no case be disclosed.

5) TRANSFER OF DATA TO FOREIGN COUNTRIES:

The processed data may also be processed and transferred, for the purposes and in the manner set out in point 1) and in point 2), to entities set out in point 4), located in countries belonging to the European Union and/or outside the European Union, but only on the basis of an adequacy decision by the European Commission, adequate privacy guarantees or authorisation by the Privacy Guarantor Authority.

6) RETENTION PERIOD:

The data will be collected and processed only for the purposes indicated at point 1) and will be kept for a maximum of ten years from the date of collection for administrative and accounting purposes and for a maximum of twenty-four months for marketing purposes.

7) MODALITIES FOR EXERCISING DATA SUBJECT RIGHTS:

In any event, you may at any time request from the Legal Representative of the Data Controller and/or the Data Protection Officer (where appointed) a copy of your personal data, information on the logic applied to the processing of your personal data and an updated list of the data processors and system administrators designated to process your data.

You may at any time freely revoke the consent given, free of charge and without prejudice to the lawfulness of the processing carried out up to that moment, and exercise the following rights of the data subject vis-à-vis the data controller, as provided for by the European Data Protection Regulation EU/2016/679: Access, Rectification, Cancellation, Restriction, Objection, Portability, Complaint to the Data Protection Guarantor.

8) RIGHTS OF THE DATA SUBJECT:

The Data subject shall always have the right to request from the Data Controller access to his/her data, rectification or cancellation, restriction of processing or the possibility to object to processing, request data portability, withdraw consent to processing, exercising these and other rights provided for by EU Regulation 679, within the limits provided for by the Regulation itself, by simple communication to the data controller. The Data Subject may also lodge a complaint with a supervisory authority.

Reference is made in particular to:

1. Art. 15 (right of access) of EU Regulation 2016/679
2. Art. 16 (right of rectification) of EU Regulation 2016/679
3. Art. 17 (right of erasure) of EU Regulation 2016/679
4. Art. 18 (right to restrict processing) of EU Regulation 2016/679
5. Art. 20 (right to data portability) of EU Regulation 2016/679
6. Art. 21 (right to object) of EU Regulation 2016/679
7. Art. 22 (right not to be subject to decisions based on automated processing) of EU Regulation 2016/679

9) RIGHT TO LODGE A COMPLAINT WITH THE SUPERVISORY AUTHORITY:

You have the right to lodge a complaint with the supervisory authority, i.e. the Garante della Protezione dei Dati Personali (Data Protection Authority), with registered office in Piazza Venezia 11, IT-00187, Rome (e-mail: protocollo@gpdp.it, PEC*: protocollo@pec.gpdp.it, switchboard +39 06.696771).

10) EXERCISE OF RIGHTS:

If you wish to obtain further information on the processing of your personal data, or if you wish to exercise your rights under 8) above, please use the contact details listed under 1) Data Controller and Contact Details.

Place and date: Roma, 10/07/2024