

## INFORMATION ON PERSONAL DATA PROCESSING PURSUANT TO ARTICLE 13 OF EU REGULATION 679/2016.

### At a glance:

Aeonvis caters to businesses, but businesses are made up of people. That is why we will do everything to meet the demands of our clientele, strive to make each user aware of the treatments necessary to fulfill their wishes, and respect the wishes of each of our clients.

Visiting the site involves some technically necessary processing to which are added functional processing for specific requests. As an example, in order to view a map of our site, the services that allow map display and route creation must be activated. These services are activated only if the visitor requests them by accessing the page that includes these functions.

Aeonvis S.p.A. wants to know the interests of its visitors, therefore, in order to improve the site, it makes use of traffic analysis tools to know which pages are the most popular, which are the least visited, to measure the feedback of promotions or initiatives, to correct errors.

Visiting a website means sharing your data not only with Aeonvis S.p.A., but also with other parties such as internet service providers, the manufacturer of your browser, the search engine with which you found the web page, etc. These treatments do not concern Aeonvis but are functional to the use of our site. At the end of this policy we will give some tips to minimize these treatments.

### Our information in detail:

AEONVIS S.P.A. (hereinafter also "the company"), as the data controller, in accordance with Article 13 of the European General Data Protection Regulation 679/2016 (hereinafter the "GDPR"), will process your data in order to offer the requested service, which normally involves the following purposes:

1. Viewing the web pages of the site;
2. Download detailed documents and technical content;
3. Sending contact requests or filling out enrollment forms;
4. Subscription to Aeonvis information channels (newsletter);
5. Access to special areas of the site dedicated to technical support, customer care, and interaction with other business functions;
6. To make their professionalism available as a future partner or collaborator of Aeonvis;
7. Access the intranet via the site's dedicated employee functions

#### Purpose and legal basis for processing.

No data of a sensitive nature (defined by the GDPR as special data) are to be processed.

Your common data (browsing data, source IP address, metrics of the device used, master data, data related to the request sent or the form filled out, etc.) will be processed with these legitimacy bases:

**(a) Legitimate interest of business development.** Your personal data will be used by Aeonvis S.p.A. to show you the contents of the site, but also for purposes relevant or pertinent to the development of its business activity, to offer you goods and services of your interest. If you do not want this processing you can object at any time by simply asking the owner in the manner described below. The data will also be processed for the legitimate interest of protection of computer systems, for the judicial protection of Aeonvis, for the reporting of any illegal behavior found to the detriment of the company. In this case, it is not possible to object to the processing.

**(b) Contractual performance.** Your personal data will be processed for the purpose of fulfilling the obligations arising from the negotiation and contract regarding the products and services offered by Aeonvis S.p.A. A request for information represents pre-contractual activity since it is directed to the conclusion of a supply contract and, therefore, we will process your data for:

1. The conclusion, management and execution of contractual relationships between you and Aeonvis S.p.A.;
2. respond to your requests;
3. The communication of notices or news, related to products or services of interest to him/her.

**(c) Consent.** Your personal data will also be processed for:

1. Subscription to informative newsletters.
2. Segmentation with respect to the products of interest to you offered by Aeonvis S.p.A.
3. Participation in satisfaction surveys and quality audits.

**Nature of data provision and consequences of refusal.**

The provision of your personal data is always optional, however, without the necessary data, the requested service, or part of it, cannot be provided.

**Categories of recipients of personal data.**

Your data will never be disseminated. Your data may be disclosed, exclusively for the purposes described above, to the following categories of subjects:

- To providers of services provided on behalf of Aeonvis S.p.A.;

**Transfer of personal data outside the European Union.**

Your personal data will only be processed in countries of the European Union or third countries that benefit from a judgment of adequacy or a bilateral agreement on the free movement of personal data.

**Retention of personal data.**

Personal data will be retained for a period no longer than is necessary to achieve the purposes for which the data were collected and subsequently processed. Personal data will be kept for the duration of the contract concluded by you and also for a period thereafter:

1. within a few hours of browsing, for all processing related to technical cookies;
2. within a few days of browsing, for all traffic analytic treatments;
3. within the time limits stipulated in current regulations, as provided in particular in Article 2220 of the Civil Code;
4. within the period necessary to protect the rights of the data owner in the event of any disputes related to the provision of the benefit, up to the statute of limitations.
5. For the internal purposes described above, which are not based on legal obligations, retention is 10 years from the end of the contractual relationship.

**Owner and Data Processors.**

Data controller Aeonvis S.p.A., Viale Achille Papa, 30, 20149 Milan Tel: +39 02 36588256.

The Data Controller has appointed a Data Protection Officer (DPO) and can be contacted at [aeonvis@privacybydesign.it](mailto:aeonvis@privacybydesign.it)

**Rights of the data subject.**

The exercise of rights varies depending on the purpose of processing and, in some cases, are severely restricted.

At any time, pursuant to Articles 15 to 22 of the GDPR You have the right to:

- to request from the controller access to your personal data and information relating thereto; rectification of inaccurate data or supplementation of incomplete data; deletion of personal data concerning you (upon the occurrence of one of the conditions indicated in Article 17(1) of the GDPR and in compliance with the exceptions provided for in paragraph 3 of the same article); limitation of the processing of your personal data (upon the occurrence of one of the cases indicated in Article 18(1) of the GDPR);
- to request and obtain from the data controller - in cases where the legal basis of the processing is a contract or consent, and the processing is carried out by automated means - your personal data in a structured, machine-readable format, including for the purpose of communicating such data to another data controller (so-called right to personal data portability);
- Object at any time to the processing of your personal data in the event of special situations concerning you;
- revoke consent at any time, limited to cases where the processing is based on your consent for one or more specific purposes and involves common personal data (e.g., date and place of birth or place of residence), or special categories of data (e.g., data revealing your racial origin, political opinions, religious beliefs, health status, or sex life). Processing based on consent and carried out prior to the revocation of consent retains, however, its lawfulness;
- Propose a complaint to a supervisory authority (Data Protection Authority [www.garanteprivacy.it](http://www.garanteprivacy.it)).

Information updated December 03, 2024

Aeonvis S.p.A.