

PRIVACY POLICY
Article 13 GDPR – Reg. UE 2016/679

CONTROLLER	DPTLab S.r.l. (VAT number IT03806741207) with registered office in 40121 – Bologna (Italy), at Galleria Ugo Bassi no. 1
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DATA PROCESSED: COMMON DATA
<p>For example, identifying data, contact details, accounting and taxation data, Internet Protocol address (IP) of devices etc.</p> <p>The common personal data of the employees/ collaborators of the Customers and Suppliers of Controller may also be processed. Such data shall also be processed according to the principles, for the purposes and reasons set out below. Therefore, we invite you to extend this Privacy Policy to these entities.</p>

PURPOSES OF THE PROCESSING	LEGAL BASIS FOR PROCESSING PERSONAL DATA	CONSEQUENCES OF REFUSAL TO PROVIDE PERSONAL DATA
<p>The Controller processes the data of its Customers and Suppliers for the following purposes:</p> <ol style="list-style-type: none"> 1. Comply with contractual and pre-contractual obligations arising from the relationship with the Controller at each stage, even after the relationship has been ended (for example sending an Offer, execution of purchase Orders, assistance also through access to Customer Care etc.). 2. Exercise of Controller’s rights arising from the pre-contractual / contractual relationship at all stages, also subsequent to the conclusion of the contractual relationship and/or the fulfilment of the related legal obligations, including litigation. 3. Enter into service agreements with third parties for the effective performance of the contractual relationship. 4. Collect data for activating, installing and using the Controller’s Software. 5. Prevent or discover fraudulent activities or harmful abuse. 6. Comply with legal obligations (e.g. accounting and taxation). 7. Data collection (log files etc.) related to the Quality Program. 8. Sending Newsletter. 9. E-mail marketing. 	<p>Purposes no. 1, 2, 3 e 4: Performance of a contract to which the data Subject is party in order to take steps at the request of the data Subject prior to entering into a contract (article 6, paragraph 1, b, GDPR).</p> <p>Purpose no. 5: Legitimate interest in safeguarding data Controller’s business assets and preventing fraud (including the unauthorised use of the Controller’s Software) and unauthorised or unlawful activities (recital 47 and article 6, paragraph 1, f, GDPR).</p> <p>Purpose no. 6: Compliance with a legal obligation to which the Controller is subject (article 6, paragraph 1, c, GDPR).</p> <p>Purposes no. 7 e 8: Consent (article 6, paragraph 1, a, GDPR).</p> <p>Purpose no. 9: Legitimate interest to carry out direct marketing (recital 47 and article 6, paragraph 1, f, GDPR).</p>	<p>Purposes no. 1, 2, 3, 4, 5, 6 e 9: <u>The consent is not requested.</u> Providing personal data is necessary to comply with contractual and pre-contractual obligation; in default, we may not be able to enter into or to perform the contract, without prejudice to the exercise of Controller’s right.</p> <p>Purposes no. 7 e 8: Failure to provide consent does not have an impact on contractual relationships.</p>

PROCESSING METHODS

Personal data shall be processed through the operations referred to in Article 4 no. 2 of the GDPR. Processing takes place mainly by automated means and sometimes on paper, using methods and tools to ensure maximum security and confidentiality:

- in compliance with the principles of lawfulness, accuracy, data minimisation, relevance, within the scope of the purposes indicated above and in order to avoid access and consequent processing by subjects not previously authorized.
- without processing that include automated evaluation and/or decision-making processes or profiling activities.
- adopting specific security measures in order to prevent the loss and/or unavailability of data, unlawful or incorrect use of data or unauthorized access.

ORIGIN OF DATA

- Communicated directly by the Data Subject.
- Communicated by any other entity authorized by the Data Subject.

RECIPIENTS OF THE DATA

- Data Controller's authorized Personnel.
- External Data Processors expressly appointed by the Data Controller and other independent data controllers entitled (e.g. service companies, consultants, auditors, judicial authorities, public and/or private entities, etc.).

The communication of data to third parties is limited to cases of actual necessity, the fulfilment of legal obligations and cases in which the Data Controller must exercise its rights (including copyright).

PLACE OF PROCESSING

- At the headquarters of the Data Controller in paper and/or computer archives.
- At the headquarters of the Data Processors.

STORAGE PERIOD

Customers' and Suppliers' personal data are stored by the Data Controller in compliance with legal obligations. As part of the processing activities, even after the end of the contractual relationship, the fundamental principles of data minimization, relevance and indispensability of personal data processed will be observed, with the adoption of any appropriate security measures.

TRANSFERS TO A THIRD COUNTRY OR TO AN INTERNATIONAL ORGANISATIONS

Personal data shall be stored on servers located within the European Union.

If, for technical and/or operational reasons, it is necessary to use entities located outside the European Union, or if it is necessary to transfer some of the collected data to third-party technical systems (for example, mailing list management platforms) and services managed in cloud and located outside the European Union, the processing will be regulated in accordance with the provisions of Chapter V of the GDPR and/or authorized on the basis of specific decisions and/or agreements of the European Union, taking all necessary precautions to ensure that the level of protection guaranteed by the Regulation is not affected.

Personal data shall not be disclosed to international organisations.

DATA SUBJECT'S RIGHTS AND CLAIM TO THE SUPERVISORY AUTHORITY

Each data subject sending a written request to the Data Controller (info@dptcorporate.com) may exercise, in relation to the aforementioned processing, the following rights (articles 15-22 GDPR):

- a) **right of access** to and information about your personal data (article 15 GDPR).
- b) **right to rectification** of inaccurate personal data and/or integration of incomplete personal data (article 16 GDPR).
- c) **right to erasure** your personal data in accordance with the Regulation's conditions (article 17 GDPR).
- d) **right to restriction** of processing only to certain personal data, if there is one of the reasons provided by the Regulation (article 18 GDPR).
- e) **right to data portability** that the user himself/herself has provided to the Controller, that is to receive them in a structured, commonly used, machine-readable format, also to transmit these personal data to another Controller (article 20 GDPR).
- f) **right to object**, in whole or in part, to the processing of personal data under the conditions provided by the Regulation (article 21 GDPR).
- g) **right not to be subject to a decision based solely on automated processing**, including profiling (article 22 GDPR).
- h) **right to withdraw consent** at any time, in cases where the processing is based on explicit consent. The said withdrawal will not affect the lawfulness of any processing carried out before the withdrawal.
- i) **right to lodge a complaint** with a supervisory authority, pursuant to article 77 and subsequent of the Regulation, which for Italy is identified in Autorità Garante per la Protezione dei Dati Personali [www.garanteprivacy.it]

If copies of documents or information are required, administrative costs may be charged.

In case of manifestly unfounded, excessive and/or repetitive requests, a contribution may also be requested in addition to the administrative costs incurred.

UPDATE OF 27TH JANUARY 2026. The Controller reserves the right to modify this Privacy Policy.

We invite you to verify periodically the presence of any updates on the website of the Controller.