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PRIVACY POLICY

INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLE 13 OF REGULATION (EU) 2016/679

Interested Parties: Users who visit the website www.achilli.com of ACHILLI S.R.L.

WHY THIS INFORMATION

Pursuant to Regulation (EU) 2016/679 (hereinafter "Regulation" or "GDPR"), this page describes the methods of processing personal data of users who visit the website of ACHILLI S.R.L. accessible electronically at www.achilli.com.

This information does not apply to other sites, pages, or online services that may be accessed via hyperlinks published on this site but refer to resources outside the domain www.achilli.com.

DATA CONTROLLER

Following consultation of the site, data relating to identified or identifiable natural persons may be processed.

The Data Controller is ACHILLI S.R.L., with registered and operational headquarters in Via Montescudo, 148 – 47924 Rimini (RN), VAT number: 02343350407, Email: info@achilli.com.

TYPES OF DATA PROCESSED, PURPOSE OF PROCESSING, AND LEGAL BASIS

1. Navigation Data

Legal Basis: Data processing necessary for browsing the website – contractual obligation – Art. 6 para. 1 letter b) GDPR.

The computer systems and software procedures used to operate this site acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This category of data includes IP addresses or domain names of the computers and terminals used by users, addresses in URI/URL (Uniform Resource Identifier/Locator) notation of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.), and other parameters relating to the operating system and the user's IT environment.

Such data, necessary to navigate the Site and to use the information contained therein, are also processed by the owner for the purpose of:

- Obtaining aggregate and anonymous statistical information regarding the use of the Site (e.g., most visited pages, number of visitors per time slot or day, geographical areas of origin of visitors, etc.);
- Checking the correct usability of the contents offered by the Site;
- Preventing or combating any possible IT crimes or fraudulent use of the features available on the site, also for the purpose of reconstructing security incidents and their traceability.

Storage Duration: Navigation data, in compliance with the principles of lawfulness, limitation of purposes, and data minimization pursuant to Art. 5 of the GDPR, will be kept for a period of time not exceeding the achievement of the technical purposes described above for which they are collected and processed, without prejudice to any needs to detect crimes by the judicial authority.

2. Data Communicated by the User

- Legal Basis: Data processing necessary to answer user questions – contractual obligation – Art. 6 para. 1 letter b) GDPR.

The optional, explicit, and voluntary sending of messages to the contact addresses of ACHILLI S.R.L., private messages sent by users to institutional profiles/pages on social media (where this possibility is foreseen), as well as the completion and forwarding of forms on the ACHILLI S.R.L. sites, involve the acquisition of the sender's contact data, necessary to respond, as well as all personal data included in such communications.

Storage Duration: The data communicated by the user are kept for the time necessary to manage individual requests. If subsequent storage for statistical purposes is provided, the data will be anonymized (except for any need for the judicial authorities to ascertain crimes).

3. Cookies and Other Tracking Systems

Types of Cookies:

- Technical Cookies: Necessary for user navigation, facilitating correct navigation of the site and usability of the contents by the user. Legal Basis: Contract as functional and necessary.

- Analytical Cookies: Used to process aggregate statistical analyses on user interaction with the site. Subject to user consent. Legal Basis: Consent.

- Profiling Cookies: Collect information about user preferences during navigation for targeted advertising and marketing campaigns. Legal Basis: Consent.

- Further Information: Detailed information on data processing, purposes, duration, and complete management of cookies, including consent and revocation, is available in the "Cookie Management" document also present in the footer.

4. Social Media Policy:

Information regarding the processing of personal data through the Social Media platforms used.

For information on the processing of personal data carried out by the managers of the Social Media platforms, please refer to the information provided by them through their respective privacy policies. The Data Controller processes the personal data provided by users through the pages of dedicated Social Media platforms as part of its corporate promotion and advertising purposes, to manage interactions with users (comments, public posts, messages, shares, etc.) in compliance with current data protection legislation and this information. Where necessary, user consent is obtained by informing them from time to time about the purposes and optionality of provision. Personal or sensitive data inserted in comments or public posts within social media channels may be removed.

- Platforms Used:

- Facebook: <https://www.facebook.com/Achillisrl>

- Instagram: <https://www.instagram.com/achillisrl/>

- YouTube: [https://consent.youtube.com/m?](https://consent.youtube.com/m?continue=https%3A%2F%2Fwww.youtube.com%2Fc%2FAchilliSrl%3Fcbid%3D1&gl=IT&m=0&pc=yt&cm=2&hl=it&src=1)

[continue=https%3A%2F%2Fwww.youtube.com%2Fc%2FAchilliSrl%3Fcbid%3D1&gl=IT&m=0&pc=yt&cm=2&hl=it&src=1](https://consent.youtube.com/m?continue=https%3A%2F%2Fwww.youtube.com%2Fc%2FAchilliSrl%3Fcbid%3D1&gl=IT&m=0&pc=yt&cm=2&hl=it&src=1)

- LinkedIn: <https://www.linkedin.com/company/achilli-s.r.l./>

RECIPIENTS OF THE DATA

Some recipients of the data collected following consultation of some of the services listed above are designated by the Data Controller pursuant to Article 28 of the Regulation as data processors, and other additional service providers in the field of web agencies, digital communication, assistance systems, and any other digital service providers. The complete list of these recipients can be requested by writing to info@achilli.com. Some data and information may be transmitted or acquired by subjects identified as independent controllers. This data relates to cookies, which are usually anonymized before sending, for example, for statistical purposes. If a transfer to non-EU countries is envisaged, the guarantee measures undertaken will be indicated, as described in paragraph 6 of this document. The personal data collected are also processed by the staff of ACHILLI S.R.L., who act on the basis of specific instructions provided regarding the purposes and methods of the processing itself.

SAFETY OF PROCESSING

The personal data transmitted and stored for the necessary time are protected by specific organizational and technical security measures in reference to Art. 32 of the Regulation. These measures ensure confidentiality, integrity, availability, and the ability to promptly restore availability and access to personal data in the event of a physical or technical incident, including protection against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access to personal data transmitted, stored, or otherwise processed.

TRANSFER OF PERSONAL DATA TO NON-EU COUNTRIES

The Data Controller does not transfer personal data to non-EU countries. If necessary, the interested parties will be informed in advance, and guarantee measures will be adopted for the transfer towards the recipients, which depending on the case may be: verification of the existence of adequacy decisions for the recipient country by the Commission, signing of standard contractual clauses, or verification of any additional measures to implement recommendation 01/2020 EDPB. In derogation from these guarantees, for data processing (in reference to Art. 49 of the GDPR), where applicable, the existence of a contract or pre-contractual measures in favor of the interested party or consent to the transfer will be verified.

RIGHTS OF INTERESTED PARTIES

Interested parties have the right to obtain from ACHILLI S.R.L., in the cases provided for, access to their personal data, rectification, cancellation of the same, limitation of the processing that concerns them, portability, or object to the processing and to withdraw consent (where used as a legal basis) in reference to Articles 15 to 22 of the Regulation. The request can be submitted through the contact details of ACHILLI S.R.L., with registered and operational headquarters in Via Montescudo, 148 – 47924 Rimini (RN), Email: info@achilli.com. To exercise your rights, it is also possible to use the form prepared and available on the

website of the Data Protection Authority at this link: <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/9038275>

RIGHT TO COMPLAIN

Interested parties who believe that the processing of personal data relating to them is carried out through this site in violation of the provisions of the Regulation have the right to lodge a complaint with the Guarantor, as required by Art. 77 of the Regulation itself, or to take action in the appropriate judicial offices (Art. 79 of the Regulation). The form for submitting a complaint is available on the website of the Guarantor Authority for data protection at this link: <https://www.garanteprivacy.it/home/docweb/-/docwebdisplay/docweb/4535524>