INFORMATION

ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679

Interested Parties: Navigators, service users, and newsletter subscribers.

"ACHILLI S.R.L.", in its capacity as Data Controller of your personal data, pursuant to and for the purposes of Regulation (EU) 2016/679, hereinafter 'GDPR', informs you that this legislation provides for the protection of individuals regarding the processing of personal data. The processing of personal data will be based on principles of fairness, lawfulness, transparency, and the protection of your privacy and rights.

To achieve its purposes related to the management of the relationship, the Data Controller needs to acquire personal data, such as your name, surname, telephone or mobile number, email address, and tax code.

Your personal data will be processed in accordance with the legislative provisions of the aforementioned legislation and the confidentiality obligations therein.

Purpose of Processing: Provision of the Service: Your data will be processed to respond to any requests that may come from the forms available on the website or from requests received by email.

Legal Basis: The legal basis of the processing is contractual, where data processing is envisaged following a request for information and a subsequent response.

Optional Purposes: Marketing - Newsletter Reception Service: Your data will be processed, subject to your free consent, for receiving newsletters by entering your email address in the appropriate text box containing relevant information when subscribing to the newsletter, or by selecting/checking the appropriate box indicating "newsletter subscription" present in a form.

Legal Basis: The legal basis of the processing is the consent of the interested party.

Consequences of Refusal for Optional Purposes: The provision of data is optional for the aforementioned purposes, and your possible refusal to the processing does not compromise the continuation of the relationship or the appropriateness of the processing itself.

Consequences of Failure to Communicate: The processing of functional data for fulfilling these obligations is necessary for the correct management of the relationship, and their provision is mandatory to implement the purposes indicated above. The Data Controller also informs that any non-communication, or incorrect communication, of any mandatory information may result in the Data Controller being unable to ensure the adequacy of the processing itself.

Processing Methods: The processing is carried out using manual and/or IT and telematic tools to ensure the security, integrity, and confidentiality of the data in compliance with the physical and logical organizational measures provided by current provisions, so as to minimize the risks of destruction or loss, unauthorized access, modification, and unauthorized disclosure in compliance with the methods set out in Articles 5, 32 of the GDPR.

Recipients: To carry out certain activities or provide support for the operation and organization of the activity, some data may be brought to the attention of or communicated to recipients. These recipients include:

Third Parties: (e.g., natural or legal persons, public authorities, services, or other bodies not being the interested party, the data controller, the data processor, and authorized persons responsible for the processing), such as:

- Companies that manage traditional or computerized postal services

- Any other subjects whose communication of data is necessary to achieve the purposes indicated above.

Data Processors: (e.g., natural or legal persons, public authorities, services, or other bodies that process personal data on behalf of the data controller), such as:

- Suppliers of IT services, web services, or other services necessary to achieve the purposes for managing the relationship.

Within the company structure, your data will be processed only by personnel expressly authorized by the Data Controller, with assurance of adoption of a confidentiality agreement, particularly by the following categories of employees:

- Administration;
- Other employees whose processing is necessary for the correct execution of the relationship.

Dissemination: Your personal data will not be disclosed in any way.

Transfer of Data to Third Countries: The Data Controller does not transfer personal data to non-EU countries. If necessary, interested parties will be informed in advance, and guarantee measures will be adopted for the transfer to the recipients, which may include verification of the existence of adequacy decisions for the recipient country by the Commission, signing of standard contractual clauses, and verification of the adoption of any additional measures in implementation of the EDPB recommendation 01/2020. Notwithstanding 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.

Retention Period: In compliance with the principles of lawfulness, purpose limitation, and data minimization, pursuant to Art. 5 of the GDPR, the retention period of your personal data is established for a period not exceeding the achievement of the purposes for which they are collected and processed. In the case of a signed contract, this retention period may cease with the expiration or withdrawal of the contract. The same provisions may be retained, where applicable, for a further period for the purpose of managing any disputes, with the legal basis for this retention being the legitimate interest of the Data Controller. The retention period for data processing relating to marketing is functional to the purposes pursued by the Data Controller and, in any case, not more than 3 years from the last contact or feedback received.

Data Controller: The Data Controller, pursuant to the law, is "**ACHILLI S.R.L.**", with its registered office and operations at Via Montescudo, 148 – 47924 Rimini (RN), VAT number: 02343350407, represented by its legal representative pro tempore. For further information regarding the data provided, you can send an email to info@achilli.com or a fax to 0541 - 389058.

EU Regulation 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22, 23 - Rights of the Interested Party

- 1. The interested party has the right to obtain confirmation of the existence or non-existence of personal data concerning them, even if not yet recorded, and their communication in an intelligible form.
- 2. The interested party has the right to obtain the indication of:
 - a. the origin of the personal data;
 - b. the purposes and methods of the processing;
 - c. the logic applied in case of processing carried out with the aid of electronic instruments;
- d. the identification details of the Data Controller, data processors, and the representative designated pursuant to Article 5, paragraph 2;
- e. the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of it as designated representatives in the State, data processors, or authorized personnel.

- 3. The interested party has the right to obtain:
 - a. updating, rectification, or, when interested, integration of data;
- b. deletion, transformation into anonymous form, or blocking of data processed in violation of the law, including data whose retention is unnecessary for the purposes for which they were collected or subsequently processed;
- c. certification that the operations referred to in letters a) and b) have been notified, also with regard to their content, to those to whom the data have been communicated or disseminated, except where this proves impossible or involves a use of means manifestly disproportionate to the protected right;
 - d. data portability.
- 4. The interested party has the right to object, in whole or in part:
- a. on legitimate grounds, to the processing of personal data concerning them, even if pertinent to the purpose of collection;
- b. to the processing of personal data concerning them for the purpose of sending advertising material or direct sales or for carrying out market research or commercial communication.

Complaint: The interested parties, if the conditions are met, also have the right to lodge a complaint with the Guarantor as the supervisory authority according to established procedures. For any further information and to assert your rights as recognized by the European Regulation, you can contact the Data Controller at the above references.

Consent:

Formula for acquiring the interested party's consent

Your consent to receive the newsletter will be recorded (IP address, email, date, and time) by ticking the box below the insertion of the email or by checking the appropriate box and clicking the "enter"/"ok" button. This consent will be archived to prove its provision and allow you to unsubscribe at any time, in addition to all the other rights set out above.