

Privacy Notice Pursuant to Article 13 of Regulation (EU) 2016/679 on the Protection of Personal Data ("Regulation")

The company AF-SYSTEM s.r.l., with registered office at Via Landini 76, 21050 Marnate (VA), Tel. +39 0331.365239, Tax ID / VAT 03562540124, represented by Mr. Andrea Lenti and Mr. Fabio Castiglioni, as DATA CONTROLLERS of personal, sensitive, or judicial data (the "Controller") pursuant to Article 13 of Regulation 679/2016, provides the following information, defined as "Privacy Notice".

Definition of Personal Data Processing

Processing of personal, sensitive, or judicial data means any operation or set of operations performed with or without the use of automated processes and applied to personal, sensitive, or judicial data or sets of personal, sensitive, or judicial data, such as collection, recording, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making available, comparison or interconnection, limitation, erasure, or destruction.

The processing of personal, sensitive, or judicial data is based on the principles of lawfulness, fairness, and transparency; purpose limitation; data minimization; accuracy; storage limitation; integrity and confidentiality, and is carried out in compliance with the rights, fundamental freedoms, and dignity of individuals.

Types of Data Processed, Purposes, and Legal Basis for Processing

Personal, sensitive, or judicial data provided to our company, including through different forms and methods such as forms or specifically prepared documentation, will be processed for all requirements related to requests you make and for the subsequent management of the employment relationship established, as well as for the achievement of the purposes provided by the professional or contractual relationship request.

Data provided may also be processed for the following purposes:

- a) management of payments and any non-compliance (debt recovery and litigation);
- b) to ascertain, exercise, or defend our rights in court;
- c) compliance with legal obligations, fiscal or accounting regulations (e.g., invoicing);

d) subject to specific and separate consent, for activities exclusively related to commercial promotion, marketing, or profiling activities.

Processing of the data provided is allowed as it is:

- necessary for the performance of the contract concluded with our company of which the data subject is an integral part;
- necessary to comply with our legal and/or regulatory obligations, e.g., in case of communication to authorities, government bodies, and/or regulatory agencies;
- necessary to initiate, carry out, or defend legal actions;
- to represent you in appropriate venues (if requested);
- to fulfill various acts necessary and provided for in the contract;
- when required by law, based on explicit consent provided on a specific form.

Nature of Data Provision and Consequences of Refusal

The provision of data, even if optional, is necessary in relation to the purposes indicated above.

In cases where processing is based on consent, such consent is considered necessary.

Any refusal, in whole or in part, to provide data or to give consent where required will make it impossible to pursue the related purposes.

Processing Methods

Data processing is carried out with or without the use of electronic, automated, IT, or telematic tools, strictly connected to the purposes indicated above.

Processing will be lawful and fair and, in any case, in compliance with the applicable regulations, using tools suitable to ensure security and confidentiality and may also be carried out using automated tools to store, manage, and transmit data.

Retention Period

AF-SYSTEM s.r.l. retains data for the period necessary to fulfill legal, contractual, and/or regulatory obligations.

The retention period depends on the purpose for which the data are processed and the tools used.

The criteria for defining the retention period are the time necessary to achieve the relevant purpose, the

time necessary to complete the contractual relationship, and the time required by applicable laws. At the end of the retention period, data will be securely deleted or destroyed, where possible, or anonymized.

Data Communication and Disclosure

Data will not be disclosed to unknown parties.

They may, however, be communicated, when necessary and/or functional to our activity, as described above, to external parties performing processing as independent controllers or as processors, belonging to the following categories:

- a) companies linked to us for operational reasons, consulting companies (administrative, labor, tax, legal, notarial) for legal compliance or to ascertain, exercise, or defend our rights in court;
- b) IT service providers;
- c) public and private bodies, also following inspections, checks, or management, for legal obligations and/or directives from public authorities (e.g., tax administration, police, judiciary).

Third parties processing data on behalf of the Controller have been carefully selected and evaluated and are equipped with experience, skills, and reliability, providing appropriate guarantees in full compliance with applicable data protection regulations, including data security.

These parties have been formally appointed as data processors pursuant to Article 28 of the EU Regulation and are subject to contractual and regulatory obligations to maintain and guarantee data confidentiality.

The company periodically verifies that processors have fully performed their assigned duties and continue to provide adequate guarantees of compliance with data protection regulations.

Data may also be communicated to external companies formally appointed as processors, providing support services involving data processing, such as legal services and debt recovery, IT system management and maintenance, administrative and accounting services, and member assistance.

A list of these processors is always available by contacting our company at contatti@af-system.it

Employees and collaborators of the Controller, duly authorized, may also access and process the data, within the limits of their functions and duties, according to instructions in the designation act.

AF System SRL

Via Francesco Landini, 76 - 21050 Marnate (VA), Italy

Phone +39 0331 365 239 | E-mail: contatti@af-system.it

Iscritta alla C.C.I.A.A. Varese REA: VA-361769 | Codice Fiscale e P.I. 03562540124

Capitale sociale: 100.000,00 € i.v.

RIGHTS

The EU Regulation specifically provides that data subjects have the following rights:

Right of access (Art. 15)

Right to access and obtain a copy of the data: the data subject has the right to request confirmation of data processing. In some cases, a copy of the data may be requested electronically.

Right to rectification (Art. 16)

If the data in our possession is incorrect, the data subject can request to update or correct such data.

Right to erasure, restriction of processing, and right to be forgotten (Arts. 17 and 18)

In some cases, the right exists to request restriction of processing and/or deletion of data.

Requests may be subject to legal rights or obligations, requiring retention for a certain period.

If the request is lawful, data will be immediately deleted.

Right to data portability (Art. 20)

Under certain conditions, the data subject has the right to receive their data in a structured, commonly used, machine-readable format and to transmit it directly to another controller.

Right to object (Art. 21)

The data subject has the right to object at any time, for reasons related to their particular situation, to the processing of their data.

In this case, we will cease processing unless there are compelling legitimate grounds that override the rights, freedoms, or interests of the data subject, or for legal claims.

The right to object to marketing applies at any time.

Right to lodge a complaint with a supervisory authority (Art. 77)

A complaint may be lodged with the Italian supervisory authority, also to request information about the exercise of your rights.

WITHDRAWAL OF CONSENT

Consent may be withdrawn at any time.

Withdrawal may concern processing of sensitive/judicial data or marketing purposes, either through the provided procedures or by sending an email to contatti@af-system.it

Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

AF System SRL

Via Francesco Landini, 76 - 21050 Marnate (VA), Italy

Phone +39 0331 365 239 | E-mail: contatti@af-system.it

Iscritta alla C.C.I.A.A. Varese REA: VA-361769 | Codice Fiscale e P.I. 03562540124

Capitale sociale: 100.000,00 € i.v.

HOW TO EXERCISE YOUR RIGHTS

Rights may be exercised at any time by sending an email to contatti@af-system.it

Identification may be requested before processing your request.

For any request, information, or doubts, please contact us via email at contatti@af-system.it

REVISION CLAUSE

We reserve the right to review, modify, and/or simply update this Privacy Notice, in whole or in part, at any time and in any manner, without notice, also considering changes in laws and/or regulations on personal, sensitive, or judicial data protection.

Any significant changes will be communicated by sending updated notices to addresses in our database or via other available communication channels.

Milan, ____ / ____ / ____

Signature for reading, understanding, and approval

CONSENT FOR MARKETING/COMMERCIAL ACTIVITIES ON OUR PRODUCTS/SERVICES

☐ I GIVE my consent

☐ I DENY my consent

For the processing of my personal data by the Controller for marketing activities regarding products/services via paper mail, email, SMS, social networks, interactive applications, push notifications, etc.

Milan, ____ / ____ / ____

Signature for reading, understanding, and approval

AF System SRL

Via Francesco Landini, 76 - 21050 Marnate (VA), Italy

Phone +39 0331 365 239 | E-mail: contatti@af-system.it

Iscritta alla C.C.I.A.A. Varese REA: VA-361769 | Codice Fiscale e P.I. 03562540124

Capitale sociale: 100.000,00 € i.v.