

PRIVACY POLICY

INFORMATION ON PERSONAL DATA PROCESSING

1. WHEREAS

In compliance with applicable privacy laws, including Regulation (EU) 2016/679 (“**GDPR**”) and the Personal Data Protection Code (“**Privacy Code**” or “**Code**”) this Privacy Policy explains how we collect your personal data while you use the website www.easyre.it (hereinafter, the “**Site**”), how we use such data, with whom we share it, and your choices in this regard.

2. PERSONAL DATA CONTROLLER

The data controller of your personal data is **DPS Soluzioni Informatiche S.R.L.** with registered office in Rome, Via Fiume Giallo No. 3, tax code, VAT No. and registration number in the Register of Companies of Rome 07043801005, e-mail address: info@dpsrsl.com (hereinafter, “**DPS**”).

Your privacy and the security of your personal data are very important to DPS, so we collect and manage your personal data with the utmost care and take specific measures to keep it safe.

Below you can find the main information about the processing of your personal data in connection with your navigation on the Site and use of the services offered.

If you have any clarifications, questions, or needs related to your privacy and the processing of your personal data, you may contact us by writing to the above address, or, if you wish, you may also contact our Data Protection Officer (DPO) by writing to info@dpsrsl.com.

3. WHAT IS MEANT BY PERSONAL DATA

Personal data, as defined by the GDPR (“**Data**”) concerns «*any information relating to an identified or identifiable natural person*». An identifiable natural person «is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person».

The Data Protection Regulation applies to the «*wholly or partly by automated means and to the processing other than by automated means of personal data which form part of a filing system or are intended to form part of a filing system*».

4. DATA COLLECTED

The Data processed by DPS is any Data that you have provided to us to request a product or the provision of a service. The Data could, by way of example, be your first and last name, contact information (including address, telephone number, and email inbox), profession, date and place of birth, and social security number. The provision of such information, if required by or essential to the execution of the contract with DPS (“**Contract**”), is a necessary requirement for the conclusion of the Contract; failure to provide such information may result in the inability of DPS to conclude the Contract and/or provide you with related services and products. Navigation Data acquired by the computer systems and software procedures responsible for the operation of the Site in the ordinary course of business such as, for example, IP addresses or domain names of computers used by users who connect to the Site are also processed, which may be used for the sole purpose of obtaining anonymous statistical information and to monitor the proper functioning of the Site and any abuses or anomalies.

DPS does not acquire or process genetic, biometric or health related Data, such as information revealing your racial origin, political opinions, or religious or philosophical beliefs.

5. PURPOSES OF PROCESSING

Your personal Data is processed by DPS primarily for the following purposes:

- conclude and execute the Contract;
- to manage the services offered by DPS;
- providing and improving the services and resolving any issues related to them (your Personal Data is used to provide functionality, analyze performance, correct any errors);
- suggestions and personalization (your personal Data may be used to identify your preferences, then suggest products or services);
- interest-based advertising (your personal Data may be used to provide you with information that we believe will be of interest to you, and to personalize the services offered);
- statistical analysis and marketing purposes.
- customer service communications.

As mentioned, the personal Data that DPS processes are those that you provide when requesting a product or providing a service and those collected while you are browsing or using the Site's features.

Data provided by the user: any data provided by the user e.g., name, address, e-mail, telephone number, ID details, credit/debit card or other payment details. Collection occurs in case of:

- **Account creation.** By creating an account on the Site you can obtain advice on DPS products and services. To enable this, we will collect your identifying information (name, e-mail, date of birth, and telephone number). We use this personal information to create and manage your account with us and to communicate with you. The legal basis for this is the provision of consent for processing for specific purposes (Art. 6(1)(a) GDPR). After the creation of your account, we will keep your username and password.
- **Contact.** When you send a question or request or ask for other support, you will need to provide your identifying information (first and last name, e-mail) and any other information you choose to indicate in correspondence. We use this personal information to respond to your questions or requests, resolve technical problems where necessary, and address any issues with the Site or the services offered therein. The legal basis is the performance of our contractual relationship (Article 6(1)(b) GDPR).
- **Consent to profiling activities.** Only in the event of express consent, DPS may use your Data to analyze your behavior, habits and propensity to consume in order to improve the products and services offered, meet your expectations, as well as send marketing communications deemed to be of your interest (provided that you have opted to receive direct and indirect marketing communications). To this end, DPS will analyze Your preferences and interests using automated analytical techniques that will provide us with information about you, including profiling. The legal basis for this is the provision of consent for processing for specific purposes (Article 6(1)(a) of the GDPR).
- **Consent to receive direct and indirect marketing communications.** Only in the event of express consent, DPS may use your Data to send marketing communications, advertising regarding products, services, events, promotions of DPS and its business partners, to conduct market research. Such Data may be processed by automated or electronic means, including e-mail, websites and mobile applications. For this purpose, DPS will analyze your preferences and

interests using automated analytical techniques that will provide us with information about you, including profiling. The legal basis for this is the provision of consent to processing for specific purposes (Article 6(1)(a) of the GDPR). By expressing your consent to marketing activities, DPS may share your Data with social networking platforms, including Facebook, LinkedIn, YouTube and other similar platforms (hereinafter, the “**Social Networks**”) to make our business more responsive to your interests. To do so, your Data will be hashed and encrypted before the Social Networks access it for the purpose of sending targeted promotional ads to Social Network users who are already DPS customers or potential customers. Where, on the other hand, targeted promotional ads are sent to users on Social Networks who appear to have shared interests or demographic data similar to DPS's existing or potential customers, only the information provided by the Social Network in accordance with their privacy policy is collected when users click on ads displayed on Social Networks; DPS does not have access to the identity of the latter users unless they choose to click on such ads. The legal basis for this is the provision of consent for processing for specific purposes (Art. 6(1)(a) GDPR). You may revoke your consent at any time in the manner provided below. We invite you, however, to check the privacy policy of your Social Networks and the consents you have provided to them.

Data automatically collected: certain categories of Data about your use of the Site services, the device you use to browse and your location are automatically collected and stored:

- **Usage Information**. Includes information regarding your interactions with the Site, such as the pages you visit, how often you access the Site, how much time you spend on each page, what you click or pause on while on the Site.
- **Device Information**. Includes certain information about the device you use to access the Site, such as browser type, browser language, hardware model, operating system, and your preferences.
- **Location Information**. This includes information about your location, which may be determined by your IP address. In this case, your explicit consent will be required and certain features and/or certain promotions and/or operations may be limited or excluded in the absence of consent or for individuals who are younger than the age indicated on the Site and/or established by applicable regulations.

We use cookies and other tracking technologies to collect this information. For more information regarding what cookies are, what they are used for, what cookies we use on the Site (including third-party cookies such as Google Analytics, Google Ads, etc.), how long they remain on your device, and how to enable or disable them please see our [Cookie Policy](#).

Data received from third parties: this is information regarding personal Data received from other sources, e.g., account Data, information about pages visited related to interactions with partner companies; search results and links, including paid ads.

Social Networks. If you interact with DPS through Social Networks, when you fill out specific forms (e.g., request for information, etc.) and/or when you interact with DPS's official Social Network pages/profiles, we may receive from the Social Networks your Data (e.g., e-mail, first name, last name, country of origin, address, house number, location, zip code, phone number), your interactions on the Social Networks (posts you like, any private messages to DPS, etc.). Depending on the settings you select in your Social Network profile, DPS may be able to receive additional Data such as your age, groups you belong to, etc., which in certain cases may allow DPS to identify you. DPS may process your Data to respond to your posts, inquiries, and research, to perform statistical analysis and market research on users interacting with DPS pages and/or DPS websites, as well as for marketing activities, as described above and subject to your consent.

In addition, should you choose to register for the Site through your account on a Social Network, we will receive some of your personal Data from the Social Network (e.g., e-mail, password, first name,

last name, date of birth, gender, country, citizenship, address, telephone). The legal basis for this is the provision of consent for processing for specific purposes (Art. 6(1)(a) GDPR).

DPS has no liability in the event of unauthorized disclosure of your Data by third-party social media channels in violation of the options you have selected and/or any consents provided. In this regard, we encourage you to check the privacy policy of your social networks and any consents you may have provided to them.

DPS Partners. If you take part in initiatives and events organized by DPS business partners and/or request them to provide you with a service, DPS may receive your personal data for the purpose of carrying out the requested service and/or the activities proposed as part of the initiative or event. The legal basis for such processing is the performance of our contractual relationship (Article 6(1)(b) GDPR).

Legal obligations. In addition to the foregoing, DPS may process your data to comply with legal obligations and, therefore, to comply with any rule or provision of law that we intend and must comply with or for the security of the Data for measures that are essential to ensure the security of your Data and company data from external attacks and/or to ward off external attacks. Again, to comply with legal obligations imposed on us and/or to prevent fraud or in case of litigation. Finally, for compulsory tax, accounting, and administrative purposes always in observance and compliance with applicable regulations. The legal basis for this is compliance with a legal obligation (Article 6(1)(c) GDPR).

Safeguarding of rights, private or public interest. Finally, DPS may process your data to safeguard DPS's rights, DPS's interests except where your interests prevail, or where it is necessary for the performance of a public task or in connection with the exercise of public authority, as provided in Article 6(1)(e) and (f) of the GDPR.

6. HOW WE SHARE YOUR PERSONAL INFORMATION

DPS may need to make the personal information identified in this policy available within the company, share it with service providers and other third parties. For example:

- **Within DPS.** DPS may share your Data with DPS subsidiaries for legitimate business purposes and general business management. The legal basis for this is DPS's legitimate interest in efficiently conducting its business.
- **With service providers.** DPS may share your Data with service providers that we use, including the provision and management of administrative procedures and computer systems, communication networks and protection and security systems, customer service activities (including with call centers, help desk), after-sales service activities and technical interventions in the area of warranty, for the management and maintenance of the Site. The legal basis is our legitimate interest in ensuring that the Site and DPS services are efficient. The above service providers include telecommunication providers, web hosting providers, IT support, shipping service providers, payment processors, marketing and e-commerce service providers, as well as Social Networks within the above limits.
- **With Third Parties.** We may need to disclose your Data to third parties, such as legal counsel, law enforcement or governmental/regulatory agencies, in order to protect our legal interests and other rights, protect against fraud or other illegal activities, avoid harmful consequences, for risk management purposes, and to fulfill our legal obligations. The legal basis for this is compliance with laws, compliance with legal obligations and our legitimate interest in protecting DPS rights.
- **In case of corporate reorganization.** If we undertake, or intend to undertake, a transaction involving a change in the structure of our business (e.g., a merger, acquisition, divestiture, joint

venture, concession, consolidation, transfer, change of control, or divestment of all or part of our business, assets, or capital), DPS would share personal information with third parties, e.g., the acquirer or the target company (and respective employees, contractors, and consultants) in order to facilitate and finalize the transaction. DPS would also share personal information with third parties in the event of corporate crisis management, bankruptcy or liquidation proceedings. The legal basis in this regard is our legitimate interest in carrying out business operations.

- **Subject to your consent.** Apart from the reasons mentioned above, we may require your consent to process your Data for specific purposes, subject to your right to withdraw your consent at any time.

DPS will appoint all the aforementioned parties where necessary as Data Processors or the same will act as autonomous data controllers in compliance with current legislation, if the relevant conditions exist.

7. CHOICES ABOUT DATA AND POSSIBLE CONSEQUENCES

You may access your account to correct or view certain personal information you have provided to us that is associated with your account.

To disable, block, delete cookies follow the directions provided in the [Cookie Policy](#).

You may opt out of receiving marketing email communications from DPS by clicking on the "Unsubscribe" link provided in each email. Remember that we will continue to send you necessary notifications about the Site, your account, or the products or services you have requested.

Providing your Personal Data is optional. However, failure to provide your Data marked as mandatory will not allow the provision of our services.

If you do not provide the remaining optional Personal Data, our services may still be offered.

The provision of Data for purposes of marketing and profiling activities is always optional.

8. NEWSLETTER

By subscribing to the newsletter service, you agree to receive information about products and services from DPS, related companies and business partners, with the aim of improving your knowledge of related products and services and access to confidential purchasing opportunities.

Your email address will be used to proceed with the newsletter service, which may also provide information about promotions of products and services provided by DPS's partners, to whom, however, your information will not be disclosed or transferred.

You may revoke your consent at any time and without cost. A notice (email, fax, or letter) is sufficient for this purpose and there is, in any case, an "Unsubscribe" link provided in each email.

9. DATA SECURITY

DPS has security procedures in place for the storage and disclosure of your personal data, as well as for protection against accidental loss, destruction, or damage.

DPS has taken appropriate technical and organizational measures to ensure a level of security appropriate to the risk in accordance with Article 32 of the GDPR, to prevent loss of Data, unlawful or incorrect use and unauthorized access.

To check the security measures taken by DPS please see Appendix A to this policy.

We require our third-party partners to take appropriate technical and operational security measures, to protect your Data, in line with Italian and European data protection regulations.

However, no measure or mode of transmission of Data is 100% secure and we cannot guarantee the absolute security of the personal information we have acquired from you.

10. YOUR RIGHTS

If the processing of your Data is subject to the GDPR, then you will have the following rights with respect to the Data processed:

- **Right of access.** You have the right to ask us for a copy of your Personal Data. This right has some exceptions, i.e. you may not always receive all Personal Data processed by us.
- **Right of rectification.** You have the right to ask us to rectify Data that you consider to be inaccurate and to ask us to supplement information that you consider to be incomplete.
- **Right to erasure.** You have the right to ask us to delete your Personal Data under certain circumstances.
- **Right to restriction of processing.** You have the right to ask us to limit the processing of your Data in certain circumstances.
- **Right to object to processing.** You have the right to object at any time, for reasons related to any of your particular situation, to the processing of your Data, which is carried out on the basis of our legitimate interests.
- **Right to data portability.** You have the right to ask us to transfer the Data you have provided to us from one organization to another or to receive such Data from us in a structured, commonly used, and readable format.
- **Right to propose a complaint.** You have the right to file a complaint with a supervisory authority.

To exercise these rights, please contact DPS through the contact form or in writing to DPS Soluzioni Informatiche S.R.L. located at Via Fiume Giallo n. 3 - 00124 Rome (RM).

You will be able to find in any case any broader reference about Current Legislation and the full text of the GDPR on the website of our Data Protection Authority at www.garanteprivacy.it .

11. TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA

As part of our contractual relationship, we may transfer Data to countries outside the European Economic Area (“EEA”). When transferring Data outside the EEA, we will use appropriate contractual measures to ensure adequate Data protection, including implementing agreements based on the standard contractual clauses adopted by the European Commission.

12. STORAGE

We will retain Your Personal Information for a limited period depending on the purpose for which it was acquired. After that period, your personal information will be irreversibly deleted or otherwise anonymized. The retention period varies depending on the purpose of processing, for example, personal information collected for contractual or pre-contractual purposes is processed until all administrative and accounting formalities are completed. They are therefore retained on file in accordance with local tax legislation, while personal information used for sending our newsletter is retained until you request to stop sending the newsletter. DPS retains personal information for ten years from the time it was given for marketing and profiling purposes, provided consent has not

been revoked. If consent is revoked, your personal information may not be processed for the above purposes but may still be retained in order to handle any objections and/or disputes. Data with hashes are deleted once the Social Networks have concluded the matching process.

13. MEANS OF PROCESSING

The processing of your Data is carried out by means of computer or manual tools, with logic strictly related to the purposes of processing indicated above and, in any case, to ensure the protection, confidentiality and security of the Data.

14. MINORS

The Site and the services offered therein are not intended for individuals under the age of eighteen (18) years.

15. LINKS TO THIRD PARTY WEBSITES

Third party websites accessible from this Site fall under the responsibility of the third party.

We disclaim any responsibility with respect to requests and/or submission of personal Data to third party websites.

16. CHANGES TO THIS POLICY

DPS reserves the right to change this Privacy Policy at any time. Any changes will be posted on this page and will specify the effective date of the changes. Therefore, we encourage you to check the Privacy Policy frequently for any updates.

This Policy was last updated on 15th February 2023.

ANNEX A

DATA SECURITY

This EASYRE software data security document, which is based on an analysis of the risks to which data (personal and non-personal) and/or processed documents are exposed, defines:

- the security systems present on the operation platforms;
- the methods and rules of access to information systems and data;
- the operational actions taken from a technical standpoint in order to ensure the security of the systems and the confidentiality of information.

1. SECURITY SYSTEMS

EASYRE is a web application and as such is run on servers that deliver service over the Internet and enjoyed by users on client browser devices.

The IT infrastructure is designed to minimize the risks of unauthorized access. The servers are protected by firewalls configured to allow access from the Internet on only the network protocols necessary for service delivery. Network access for technical/administrative interventions to the servers is enabled only from the corporate network and/or via VPN.

User access via the Internet is exclusively in HTTPS with a constantly updated Secure Socket Layer certificate.

Antivirus, from market-leading vendors, is active on the servers in order to prevent the spread of malicious software (viruses and worms) by protecting both the system itself and the data.

At the database level, the recorded information is encrypted when it is saved and therefore made unreadable even to DB Administrators. In addition, the database is further protected by a security certificate installed on the server that encrypts the database files and prevents them from being restored in the absence of the key.

2. ACCESS TO SYSTEMS AND DATA

Access to the servers is allowed only to authorized personnel and those in charge of technical maintenance work. The utilities used are personal and named. Passwords must meet complexity criteria and must be changed at least every six months. Administrative authorization profiles are limited to allow required and necessary maintenance activities.

Data access by users is exclusively through the application, which records access and changes made by each user. User profiles are configured to allow access only to the information for which they have been authorized. The data recorded in the logs are consulted only when necessary in compliance with privacy regulations.

3. OPERATIONAL INTERVENTIONS

In order to ensure the security of the systems and the confidentiality of information, periodic interventions are carried out on the servers.

At least semi-annually, network, firewall, and user configurations are checked to validate that they meet the predetermined criteria. At least quarterly, security patches are applied to the applications used on the platform.

Backups, centrally managed, are performed daily by automated tools; backup logs are constantly analyzed to verify their correct execution. On a monthly basis, sample restore tests are performed to verify the consistency of the copies.