

INFORMATION ON THE PROCESSING OF PERSONAL DATA (EU REG. n. 679/2016) FOR NEWSLETTER

In accordance with Article 13 of Regulation (EU) No. 2016/679 of the European Parliament and of the Council of 27 April 2016, concerning the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the "General Data Protection Regulation" or "GDPR"), and repealing Directive 95/46/EC, we hereby inform you that the personal data you voluntarily provide to A TLC SRL will be processed in compliance with applicable data protection legislation and the principles of confidentiality governing the Company's operations.

1. Data Controller

The Data Controller is A TLC SRL (commercial brand Aethra Telecommunications®), with a registered office at Corso Magenta 56, 20123 Milan, and an operational headquarters at Via 1° Maggio 26, 60131 Ancona, Italy. PEC: a-tlc@legalmail.it.

2. Personal Data

The processing will involve the following categories of personal data:

- Contact information (e.g., email address and telephone number);
- Personal details (e.g., name, surname, date of birth, gender, profession);
- Technical information (e.g., IP addresses, cookie data).

3. Purpose of the processing

The processing of your personal data is intended for the purpose of sending communications related to direct marketing activities of A TLC SRL, which may include newsletters, promotional materials, and communications regarding products, training courses, conferences, and cultural or scientific events offered or sponsored by A TLC SRL, utilizing automated means such as email, postal mail, and telephone communications.

4. Legal basis of the processing

The processing of your data for the purposes outlined in Section 3 is based on your explicit consent, which you are free to grant or withhold and may revoke at any time.

5. Processing methods

The processing of your personal data will be conducted using appropriate paper, electronic, and/or telematic means, in compliance with the relevant regulatory provisions governing personal data processing, employing suitable security measures to ensure the integrity and confidentiality of the data. The processing will be managed by personnel specifically trained and instructed in data protection.

6. Disclosure and sharing of data

Your personal data will be disclosed to specific parties, strictly within the scope necessary to fulfill the purposes described in Section 3, including:

- Authorized internal personnel of the Company;
- Third parties providing services for the management of the newsletter and website. Those parties will act as data processors appointed in accordance with Article 28 of the GDPR. An up-to-date list of data processors is available at the Data Controller's headquarters.

7. Retention period

Your personal data will be retained for a period not exceeding what is necessary to achieve the purposes for which they are processed, in accordance with the principle of data minimization set forth in the GDPR. Specifically, your data will be retained for the duration of the newsletter service until consent is revoked.

8. Rights of the data subject

With regard to your personal data, you have the right to request from the Company, in accordance with the GDPR:

- Access to your data as provided for;
- Rectification of inaccurate data and completion of incomplete data;
- Erasure of data under applicable circumstances, such as when they are no longer necessary for the purposes indicated or have been processed unlawfully;
- Restriction of processing under specified conditions, such as in the case of disputing the accuracy of the data;
- Data portability, i.e., the right to receive, under certain circumstances, your data in a structured, commonly used, and machine-readable format, and to transmit such data to another data controller;
- Opposition to processing under specified conditions.

Please note that you may opt out of receiving newsletters at any time by selecting the "unsubscribe" option included in each newsletter. Upon such action, you will no longer receive newsletters from A TLC SRL.

9. Procedures for exercising rights

You may exercise the rights enumerated in Section 8 by contacting us via email at privacy@aethra.com or by sending a letter to **A TLC SRL, Via 1° Maggio 26, 60131 Ancona, Italy**.

The response time for such requests is one (1) month, which may be extended by an additional two (2) months in the event of complexity. In such cases, A TLC SRL will provide at least one interim communication within one (1) month. The exercise of these rights is generally free of charge, except in cases of manifestly unfounded or excessive requests (including repetitive requests), where a fee may be imposed.

10. Complaints

If you are dissatisfied with our response, you have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali).

11. Data transfer abroad

Your personal data will be stored at the Company's headquarters and on servers located within the European Union.

12. Automated decision-making

Your personal data will not be subject to automated decision-making processes.

13. UPDATES

This policy shall take effect from the date of its publication. To ensure compliance with evolving regulatory requirements and to address any information needs regarding privacy, this document may be subject to updates and amendments.

WITHDRAWAL FORM OF THE DATA SUBJECT

I, the undersigned, wish to withdraw my consent to the processing of my personal data by A TLC SRL.

Accordingly, A TLC SRL no longer possesses my consent for the processing of my personal data as detailed in Section 2 of the Information on the Processing of Personal Data (EU Reg. No. 679/2016), which was previously granted through the "Data Subject Consent Form."

The withdrawal of consent does not affect the lawfulness of the processing activities carried out so far.

Signature:

Date: