

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

A TLC SRL (commercial brand Aethra Telecommunications®), with registered office in Corso Magenta 56 – 20123 Milan and with operational headquarters in Via 1° Maggio 26 – 60131 Ancona (Italy), in its capacity as Data Controller,

informs you of the processing of personal data that you carry out in order to propose your offer and to establish and execute contracts with your customers/suppliers.

1. What types of data?

The data we process are those provided by you during the contracting process in commercial proposals, in addition to those always provided by you or in any case generated in the execution of the contracts stipulated. Your data may also have been provided to us by the company for which you work as, for example, the manager of the contract with A TLC.

In certain circumstances, A TLC may also process your data from public administrations, public registers and archives, third party partners (such as affiliated companies) or suppliers.

Personal data processed:

Identification and contact data (first name, last name, addresses, e-mail, company telephone numbers of employees, IP address).

2. What are the purposes of processing?

A TLC may process data for the following purposes.

1) Purposes related to the establishment and management of the contractual relationship, the provision of the Services, and/or the supply of Products, and the related business processes; administrative management; execution of contractual obligations and faculties; support, updating and technical information regarding TLC services and products; legal obligations related to regulatory, civil, fiscal, accounting, financial aid rules, etc., as well as to the services that A TLC must render for the purposes of justice and for the possible sending of institutional communications required by public measures; the legal basis is to be found in Article 6.1 of EU Regulation 679/2016, as the processing is necessary for the execution of a contract to which the Data Subject is a party.

2) Purposes related to the prevention and protection of credit risk, such as: the acquisition of information prior to the conclusion of the contractual relationship through the consultation, also through specialized companies, of public and private archives that may contain financial information concerning you (e.g., prejudicial entries and protests), or that pertain to your identification (e.g., Public system for the prevention of fraud in the consumer credit sector and deferred or deferred payments, with specific reference to Identity Theft) and which will be processed, also in conjunction with information already in the possession of A TLC on current or terminated contracts, for the time necessary to instruct the file; transactions on the basis of the obligations arising from the contractual relationship and the verification of compliance with the aforementioned obligations, also with a view to changing contracts or establishing new contractual relationships; the protection,

even in court, of A TLC's credit and contractual reasons; the legal basis is to be found in the legitimate interest of the Data Controller in the protection of its interests pursuant to Article 6.1 letter f of EU Regulation 679/2016.

3) Economic and statistical analysis; social, cultural and solidarity initiatives; commercial information; marketing and references; sending by A TLC of advertising/information/promotional material and updates on initiatives and offers of our Companies, and/or of third party companies that operate or not in collaboration with A TLC, also in relation to programs and promotions, also online, aimed at rewarding customers. The development of personalized plans, for the improvement, adaptation and innovation of services and contents through profiling and statistics of specific preferences and individual and consumer data of the customer, including those relating to the use of applications related to the services provided by A TLC and the adhesion, participation and exercise of other promotional initiatives of A TLC. The legal basis is to be found in the free consent expressed by the interested party pursuant to Article 6.1 letter a of EU Regulation 679/2016.

3. Which treatments are necessary and which are optional?

The processing described in point 1) is necessary to form and execute contracts and to comply with the related legal obligations. The processing described in point 2) is also necessary for the formation and execution of the contract and in any case for the pursuit of A TLC's legitimate interest in the correct formation and execution of the relationship, the fulfilment of the obligations arising from it and, in any case, the protection of its contractual reasons. The acquisition of data for the purposes indicated in points 1) and 2) is therefore necessary and constitutes an essential requirement for the conclusion and execution of the contract, without which it would not be possible to activate and carry out the service.

The processing described in point 3) depends on your consent and is not necessary for the conclusion of contracts and the provision of services. There are therefore no consequences in the event of your refusal or revocation of the consent given, which is always possible without prejudice to the lawfulness of the processing prior to the revocation. Unless otherwise permitted by law, TLC will only be unable to provide you with more information on the development of its Services and a greater adaptation of the same to your needs. The communications referred to in point 3) may take place in traditional ways (e.g., paper mail, telephone calls with an operator), automated and similar (e.g., e-mail, text message). You can always exercise your right to object, in the manner indicated below. The opposition, in the absence of your indication to the contrary, will refer to both traditional and automated communications. Again in the manner indicated below, you can also specify whether you intend to give consent only for communications in traditional ways.

4. To whom can they be communicated?

Your data, for the performance of the processing referred to in points 1), 2), and 3) may be communicated and/or disseminated or in any case transferred - including abroad, within and outside the European Union, in compliance with the rights and guarantees provided for by current legislation - to other parent and/or controlled and/or investee and/or associated and/or associated organizations, to the TLC sales network (e.g., agents/call centers, dealers, distributors, etc.), to our suppliers, subcontractors and/or financial intermediaries, where engaged in the execution of our orders (e.g., IT and telematic service providers, including cloud, customer service, maintenance and technical assistance, installation, administration and invoicing, enveloping and shipping, market research and aimed at detecting the degree of customer satisfaction, etc.), to persons, companies, associations or professional firms that provide assistance and advice to our Company, to banks and payment service providers, data processing centres, subjects that operate for the verification and prevention

of identity theft, debt collection companies and that carry out commercial information and credit risk and fraud prevention activities, to public entities, for the granting of contributions and aids of any kind related to the provision of TLC services, to administrations and other public authorities in compliance with regulatory obligations.

In the case of transfers outside the European Union, the same will be limited to countries for which there is an adequacy decision of the EU Commission or in any case will be subject to adequate guarantees according to EU Regulation no. 679/2016. You may request information in this regard, including a copy of the data or an indication of the place where they have been made available, by contacting the contact points of the Privacy Office indicated below.

5. How and for how long are the data processed?

A TLC processes data in compliance with adequate security measures, also to prevent unauthorized or unlawful processing and accidental destruction or loss of data. The processing is carried out by A TLC, in its capacity as Data Controller, by its delegates of various types (internal and external) identified and appointed for the purpose, and placed under the authority of A TLC itself, as well as by the other recipients mentioned above. The treatments are carried out in manual and/or electronic mode.

A TLC retains and processes personal data for the time strictly necessary to fulfill the purposes indicated in this policy. This retention period may not exceed 10 years beyond the conclusion of the contractual relationship and 2 years for marketing activities, or until the Data Subject requests the cancellation of the processing.

6. What are your rights?

You have the right to request access to your personal data, the rectification and deletion of the same, the limitation of the processing that concerns you as well as to object to the same processing, including those carried out for the purposes referred to in point 4) above. As mentioned above, with respect to processing for promotional and commercial purposes (purpose 4) you have the right to withdraw consent at any time, without prejudice to the lawfulness of the processing based on the consent given before the withdrawal. You also have the right to lodge a complaint with the Guarantor for the protection of personal data, in the forms provided.

7. Who can you contact?

A TLC SRL Via 1° Maggio n.26 – 60131 Ancona (Italy)
Email: privacy@aethra.com

DATA SUBJECT CONSENT FORM

I, the undersigned, I hereby consent to the processing of my personal data by A TLC SRL for the purposes set out in point 2.3 of this policy.

I am aware and have been informed of the fact that I can withdraw my consent at any time by using the "DATA SUBJECT WITHDRAWAL FORM," and sending it by e-mail to: privacy@aethra.com;

or by sending it by post to:

A TLC SRL
VIA 1^ MAGGIO N.26 – 60131 ANCONA (ITALY)

Company:

Data:

WITHDRAWAL FORM OF THE INTERESTED PARTY

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

Therefore, A TLC SRL no longer has my consent to the processing of my personal data referred to in point 2 of the information on the processing of personal data (EU Reg. no. 679/2016); which was previously granted using the "Data Subject Consent Form."

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

Company:

Data:

